United States Court of Appeals

for the Second Circuit



APPELLANT'S APPENDIX

Docket No. 76-7373

In The

United States Court of Appeals

For the Second Circuit

GERALDINE SEVOR,

Plaintiff-Appellee,

— *vs* —

LITTON INDUSTRIES, INC., LITTON BUSINESS SYSTEMS, INC., and McBEE SYSTEMS, A Subsidiary of Litton Industries,

Defendants-Appellants.

UNITED STATES COURT OF APPEALS
FILED
SEP 30 1976
A. DANIEL FUSARO, CLERK
SECOND CIRCUIT

Civ. No. 75-559

On Appeal From a Decision and Order of the United States District Court for the Western District of New York

APPELLANTS' APPENDIX

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DIST/OFFICE	DOCKET YR.	DOCKET NUMBER	FILING DATE MO.	DAY	YEAR	J	N/S	O	R	R 23	DEMAND $ 100	DEMAND OTHER	JUDGE NUMBER	JURY DEM.	DOCKET YR.	DOCKET NUMBER
209 1	75	0559	12	30	75	3	442	1				Injunction Dec.Jdgmt.	0902		75	0559

PLAINTIFFS	DEFENDANTS
SEVOR, Geraldine	LITTON INDUSTRIES and McBEE SYSTEMS, A subsidiary of Litton Industries LITTON BUSINESS SYSTEMS, INC.

CAUSE Civil Rights - Jobs
42 U.S.C. 2000(e)
29 U.S.C. 206(d)

CW

ATTORNEYS

Emmelyn Logan-Baldwin
510 Powers Building
Rochester, New York 14614

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500 Reynolds Arcade Building
Rochester, New York 14614

Jeanette M. Thomas, Esq.
360 North Crescent Drive
Beverly Hills, California 90210

☐ CHECK HERE IF CASE WAS FILED IN FORMA PAUPERIS

FILING FEES PAID			STATISTICAL CARDS
DATE	RECEIPT NUMBER	C.D. NUMBER	CARD DATE MAILED
			JS-5
			JS-6

UNITED STATES DISTRICT COURT DOCKET

DC-111 (Rev. 1/75)

CERTIFIED COPY OF DOCKET ENTRIES.

DATE 1975	NR.	PROCEEDINGS
Dec. 30		Filed Complaint
30		Issued Summons & 2 copies
30		JS 5 made
30		Filed Pltf's. first notice to produce-FRCP 34
1976		
Jan. 7		Filed original summons & mar. ret. on complaint & notice to produce served on Litton Industries & McBee Systems on 1-5-76
Feb. 2		" stipulation extending time for defts. to answer to 2-10-76 to respond to pltfs. request to produce to 3-4-76-SO ORDERED Clerk
11		Filed Defts. notice of motion & motion to dismiss ret. 2-23-76 Adj. to 3-22-76
Mar. 5		" Defts.' affidavit
5		" Defts.' responses and objections to Pltf's. first notice to produce
22		" Pltf's amended complaint.
22		" Pltf's notice of cross motion to compel discovery; opposition to Defts'. motion to dismiss.
22		Motion by defts. to dismiss. Cross-motion by Pltf. to compel discovery. Adj. to 4-12-76
Apr. 2		Filed Defts. affidavit in support of a motion to dismiss the complaint.
8		" Defts. affidavit in opposition to a motion to compel production of documents & in support of motion for summary judgment.
8		Issued summons and 3 copies.
12		Filed Pltf's supplemental affirmation in support of cross-motion to compel discovery; opposition to Defts'. motion to dismiss
12		Motion by Defts. to dismiss. Cross-motion by pltf. to compel discovery. To be submitted 4-26-76
14		Filed Pltfs. affidavit in support of cross-motion to compel discovery, opposition to defts' motion to dismiss
14		Filed summons & Mar. ret. on S&C served on Litton Industries, Inc. 4-12-76, Litton Business Systems, Inc. & McBee Systems 4-12-76 (complaint, notice to produce & amended complaint)
28		Filed affidavit of Frank Masi in support of a motion by defts. to dismiss the complaint.
28		" affidavit of Alan Snodgrass in support of motion by defts. to dismiss the complaint.
28		" Mar. ret. on S&C, notice ot produce & amended complaint served on McBee Systems 4-26-76; Litton Business Systems, Inc., Litton Industries, Inc. 4-26-76
May 3		Filed Defts., notice of motion & motion to dismiss etc. ret. 5-24-76
11		Filed Pltf's. supplemental affirmation in support of cross-motion to compel discovery and in opposition to Deft's. motion to dismiss.
24		**Filed Pltf's. affirmation and notice of cross-motion to compel discovery; opposition to Deft's. motion to dismiss ret. at Roch. 5-24-76**
24		**Motion by Defts. to dismiss. Cross-motion by pltf. to compel discovery Submitted for decision.**
June 30		Filed Decision that the motion of Litton Industries, Inc., Litton Automated Business Systems, Inc. & McBee Systems to dismiss F-177 the 2nd amended complaint & for a protective order etc. is in all respects denied. Defts. shall comply with pltfs. notice to produce etc.-Burke, DJ Notice & copies to Emmelyn Logan-Baldwin & Brennan, Centiner, Palermo & Blauvelt
July 7		Filed stipulation & order correcting the caption in the summons F-178 served on Dan Johnson etc.-Burke, DJ Notice to Emmelyn Logan-Baldwin and Anthony R. Palermo
26		" at Roch. Defts'. Notice of Appeal (copy mailed 7-27-76 to Ms. Logan-Baldwin and to Clerk, CCA with cy. of docket entries; CCA's Forms C and D mailed to Mr. Palermo)

CERTIFIED COPY OF DOCKET ENTRIES.

CIVIL DOCKET CONTINUATION SHEET

PLAINTIFF	DEFENDANT	DOCKET NO Civ-75-559
Geraldine Sevor	Litton Industries, Inc., et al.	PAGE 3 OF ____ PAGES

DATE 1976	NR.	PROCEEDINGS
July 26		Filed Bond for costs on appeal

ATTEST: A TRUE COPY

[illegible] S, Clerk

[signature] Wright

D[illegible]ty Clerk

~~Original Sitting~~

DC 111A (Rev. 1/73)

SUMMONS, dated 12-30-75, and COMPLAINT, dated 12-29-75, both filed 12-31-75.

SUMMONS IN A CIVIL ACTION (Formerly D. C. Form No. 1a Rev. (6-41)) CIV. 1a (7-64)

United States District Court

FOR THE

WESTERN DISTRICT OF NEW YORK

CIVIL ACTION FILE NO. 75-559

GERALDINE SEVOR,
76 Henriotta Street
Rochester, New York 14620

Plaintiff

v.

LITTON INDUSTRIES
255 North Goodman Street
Rochester, New York 14607
and
McBEE SYSTEMS, A Subsidiary of
Litton Industries
255 North Goodman Street
Rochester, New York 14607,

Defendants

SUMMONS

To the above named Defendants:

You are hereby summoned and required to serve upon

EMMELYN LOGAN-BALDWIN

plaintiff's attorney, whose address

510 Powers Building
Rochester, New York 14614

an answer to the complaint which is herewith served upon you, within 20 days after service of this summons upon you, exclusive of the day of service. If you fail to do so, judgment by default will be taken against you for the relief demanded in the complaint.

JOSEPH M. SEALS
Clerk of Court.

Deputy Clerk.

Date: DEC 31 1975

[Seal of Court]

NOTE:—This summons is issued pursuant to Rule 4 of the Federal Rules of Civil Procedure.

SUMMONS, dated 12-30-75, and COMPLAINT, dated 12-29-75, both filed 12-31-75.

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF NEW YORK

GERALDINE SEVOR,
76 Henrietta Street
Rochester, New York 14620,

Plaintiff,

-vs-

LITTON INDUSTRIES
255 North Goodman Street
Rochester, New York 14607

and

McBEE SYSTEMS, A Subsidiary of
Litton Industries
255 North Goodman Street
Rochester, New York 14607

Defendants.

COMPLAINT

JURISDICTION

1. This is an action for injunctive relief, declaratory judgment and money damages. The action arises under Title VII of the Act of Congress known as The Civil Rights Act of 1964, as amended by the Equal Employment Opportunity Act of 1972, 42 U.S.C. §2000(e) et seq and the Fair Labor Standards Act, Equal Pay Act, 29 U.S. C. §§206(d), 215 and 216. The court has jurisdiction over this action pursuant to 28 U.S.C. §§1343(4), 2201, 2202, 42 U.S.C. §2000 (e)5(f) and 29 U.S.C. §§215,216. The jurisdiction of this court is invoked to secure protection of and to redress deprivation of rights to equal employment opportunities.

2. Charges of discrimination have been filed with the Equal Employment Opportunity Commission. The charges were properly deferred; more than one hundred and eighty (180) days have elapsed since the Equal Employment Opportunity Commission

took jurisdiction over the charges. The Equal Employment Opportunity Commission has issued a Right to Sue Notice to the plaintiff. This action is brought within 90 days of the receipt of that Right to Sue Notice by the plaintiff on October 7, 1975. A copy of the Right to Sue Notice is attached hereto and made a part hereof as Exhibit A.

PARTIES

3. Plaintiff Geraldine Sevor is a private citizen who resides at 76 Henrietta Street, Rochester, New York. Plaintiff was employed by defendant Litton Industries for nine years from 1964 until 1973. She was rehired in December 1974 by McBee Systems, a subsidiary of Litton Industries, but was unlawfully terminated just before her job training commenced.

4. Upon information and belief, defendant Litton Industries is a private corporation organized under the laws of the State of New York. Upon information and belief, the defendant McBee Systems is a subsidiary of Litton Industries. The defendants are employers within the meaning of Title VII of the Civil Rights Act of 1964, as amended by the Equal Employment Opportunity Act of 1972.

STATEMENT OF CASE

5. This is a proceeding to enforce the rights of the plaintiff to equal employment opportunities. Plaintiff seeks employment, training, promotion and advancement opportunities from the defendants. Plaintiff seeks reinstatement, damages, back pay and employee benefits by reason of the illegal termination of her by the defendants. Plaintiff seeks an injunction restraining the defendants from maintaining a practice, policy, custom or usage of:

(a) Discriminating against plaintiff and other persons similarly situated because of sex with respect to compensation, terms, conditions and privileges of employment, including, without intending to limit, hiring, transfer and promotion, and,

(b) Limiting employees of defendants in ways which deprive plaintiff and other persons similarly situated of employment opportunities and otherwise adversely affect their status as employees because of sex.

6. The defendants have consistently and purposely limited and deprived potential and present women employees of their rights guaranteed to them under the United States Constitution and federal law, with the intent and design, both directly and indirectly, of fostering and protecting the advancement of men employees, to the detriment of women employees.

COUNT I

7. The defendants maintain a policy and practice of discriminating against its women employees, including plaintiff herein, by virtually excluding them from certain job classifications, to wit, those job classifications of managerial and policy making levels with high pay and status. Job classification determines the rate of pay an employee receives, as well as professional status and benefits. Women employees, including plaintiff herein, are classified in lower job classifications and receive lower rates of pay than the men employees who perform the same or similar duties or responsibilities and who possess the same or lesser training and competence.

8. The defendants discriminate against the plaintiff and other persons similarly situated by maintaining a policy, practice, custom and usage of paying women employees less than

their men counterparts, when the education, skill and professional competence of the women employees equals or exceeds the education, skill or competence of the men employees engaged in the same or similar work.

9. The defendants maintain a policy, practice, custom and usage of recruitment for employees which is directed to seeking and hiring only men for the best paying, career oriented jobs, while seeking and hiring women, including plaintiff, herein for lower paying jobs with little or no career and advancement prospects.

10. The defendants maintain a policy, practice, custom and usage of excluding women, including plaintiff herein, from training programs and/or opportunities to which men with the equivalent or less education and skills are enrolled and are afforded either at the commencement of their employment or during certain stages of their employment.

11. The defendants discriminate against the plaintiff and women employees by maintaining a policy, practice, custom and usage of promotion which is directed to seeking and promoting only men for the best paying, career oriented jobs, when the education, skill and professional competence of women employees equals or exceeds the education, skill and competence of the men employees promoted.

12. The defendants discriminate against the plaintiff and other women employees by maintaining a policy, practice, custom and usage of transferring employees which is directed to seeking and transferring only men for the best paying, career oriented jobs when the education, skill and professional competence of the women employees equals or exceeds the education, skill and competence of men employees transferred.

SUMMONS, dated 12-30-75, and COMPLAINT, dated 12-29-75, both filed 12-31-75.

13. The defendants discriminate against the plaintiff and other women employees by maintaining a policy, practice, custom and usage of denying women employees titles, pay and job status to which they are entitled by virtue of their job functions, performances, background and experience. This title, pay and status is given to men.

14. The defendants discriminate against the plaintiff and other women employees by maintaining a policy, practice, custom and usage of appointment criteria for positions which are not validated pursuant to law in that they are not relevant to the qualifications for the job; such criteria are used so that men employees receive jobs while women employees are excluded from job opportunities.

15. The defendants discriminate against the plaintiff and other women employees by maintaining a policy, practice, custom and usage of varying job standards and/or qualifications to accommodate employment for men employees, but not extending the same accommodation to women employees or prospective women employees.

16. The defendants discriminate against the plaintiff and other women employees by maintaining a policy, practice, custom and usage of fostering an atmosphere in the employment situation which is calculated to harass, embarrass, humiliate and thereby cause the women employees to "keep their place".

17. The defendants discriminate against the plaintiff and other women employees by maintaining a policy, practice, custom and usage of retaliating against their employees for complaining of illegal employment practices and/or for supporting others' complaints of employment discrimination.

SUMMONS, dated 12-30-75, and COMPLAINT, dated 12-29-75, both filed 12-31-75.

18. Plaintiff Geraldine Sevor's first employment with Litton Industries was from 1964 until 1973. Plaintiff Sevor worked first as a secretary and then as general office manager of the Rochester district office of Litton Automated Business Systems, and then for one and one-half years as an installer of computers for Litton Automated Business Systems. Plaintiff Sevor received excellent evaluations throughout her nine years of employment with Litton Industries. In March 1973 plaintiff was offered a sales position by the district manager of Litton Automated Business Systems; the plaintiff refused because she knew the salary was far below what a man would have been offered. In September 1973, plaintiff Sevor left the company to return to college full time. She was assured that she had been an excellent employee and was urged to return to the company at any time in the future.

19. In October 1974, plaintiff Sevor was approached by Dan Johnson, manager of the Buffalo district office of McBee Systems, a division of Litton Industries, who offered her a position as outside sales person. Mr. Johnson stressed plaintiff Sevor's job knowledge and ability and urged her to accept the offer. As a result, plaintiff Sevor resigned from the job she had with the Genesee-Regional Health Planning Council and signed a contract with Litton Industries in December 1974. Mr. Johnson explained that plaintiff Sevor would be sent to a training school in New Jersey for three weeks. Arrangements were made for plaintiff to leave for the training school on January 19, 1975.

20. On January 16, 1975 Mr. Johnson called plaintiff Sevor and told her she had been "scratched" as a result of a cutback.

On information and belief the defendants hired a man, Keith Enstice, for the position, and this man was sent to the training school in New Jersey in plaintiff's place. On information and belief, Mr. Enstice has had very limited sales experience and does not have any of the job experience with Litton Industries which plaintiff Sevor has. On information and belief, plaintiff Sevor is far more qualified for the position and was terminated from employment with the defendants solely on account of her sex.

21. Plaintiff Sevor talked with Joseph Behan, who was an employee of Litton Industries, on or about the day after she was terminated. Mr. Behan told plaintiff that David Miller, the man plaintiff would have been working under, had said that he would prefer to work with a man. Mr.Behan also told plaintiff that he had been told that William Peck, the regional manager for McBee Systems, did not want to take a chance on another woman doing sales work because two previous women employees in the Buffalo area had not "worked out".

22. On information and belief, witnesses to the discrimination herein have been intimidated and harassed by the defendants ever since plaintiff filed complaints of employment discrimination with the New York State Division of Human Rights and with the Equal Employment Opportunity Commission.

23. The foregoing acts of the defendants to discriminate against plaintiff by denying her equal terms, conditions and privileges of employment and terminating her employment because of sex are part of a pattern, practice, custom and usage of discrimination engaged in by defendants on the basis of a person's sex.

24. Title VII of the Civil Rights Act of 1964, 42 U.S.C. §2000(e) et seq, as amended in 1972, provides for injunctive and

other relief against discrimination on the basis of sex in employment.

25. As a result of defendants' actions, plaintiff and other persons similarly situated have been and are being subjected to the denial of equal employment opportunities because of their sex. Plaintiff and other persons similarly situated have been and are being subjected to the denial of rights secured to them by Title VII of the Civil Rights Act of 1964.

26. By reason of the unlawful and discriminatory actions of the defendants, plaintiff has suffered damages. The discriminatory acts of the defendants have caused plaintiff illness of body and mind in that plaintiff has been required to seek medical care and has been embarrassed and humiliated and has been subjected to pain and suffering.

27. As a direct consequence of the illegal and unconstitutional acts of the defendants, plaintiff and others similarly situated have suffered and continue to suffer irreparable injury. Unless this court grants the injunctive relief requested, plaintiff will continue to suffer loss of employment, equal pay, training, promotion, transfer and advancement, for example. Further, absent the equitable relief requested herein, the defendants will succeed in enforcing their policy, practice, custom and usage of sex discrimination. Plaintiff has no adequate remedy at law. Absent the equitable relief requested herein, plaintiff will continue to suffer irreparable injury.

SUMMONS, dated 12-30-75, and COMPLAINT, dated 12-29-75, both filed 12-31-75.

COUNT II

28. Plaintiff realleges and incorporates herein all of the aforementioned allegations as though they were fully set forth.

29. The actions of the defendants to deprive the plaintiff and other persons similarly situated of equal employment benefits and wages by paying plaintiff and other persons similarly situated less wages and benefits than defendants pay to men employees who perform equal work and which jobs require equal skill, effort, responsibility and which are performed under similar working conditions, is a deprivation of rights secured to the plaintiff and other persons similarly situated by Acts of Congress, including without limitation 29 U.S.C. §206(d).

30. As a direct consequence of the illegal acts of the defendants, plaintiff and other persons similarly situated have suffered and continue to suffer damages and loss of equal pay and benefits for equal work. Defendants knew or should have known that the Equal Pay Act affected their employees, including plaintiff herein; the total disregard for the provisions of the Equal Pay Act by the defendants constitutes a willful violation of that act.

31. All of the practices herein alleged are continuing up to the present time.

32. By reason of the foregoing unlawful and discriminatory acts of the defendants, plaintiff has suffered mental anguish, embarrassment, pain, suffering, humiliation, loss of wages and benefits and damages.

SUMMONS, dated 12-30-75, and COMPLAINT, dated 12-29-75, both filed 12-31-75.

PRAYER FOR RELIEF

WHEREFORE, the plaintiff respectfully prays that this court advance this case on the docket, order a speedy hearing at the earliest possible date, and cause this case to be in every way expedited, and upon such hearing:

1. Issue a declaratory judgment that the employment practices set forth above violate Title VII of the Civil Rights Act of 1964, 42 U.S.C. §2000(e), as amended and the Equal Pay Act, 29 U.S.C. §§206(d), 215 and 216.

2. Grant the plaintiff preliminary and permanent injunctions:

(a) Prohibiting the defendants, their agents, successors, employees, attorneys and those acting in concert with them and at their direction from engaging in any of the practices set forth above or any other practice shown to be discriminatory with respect to compensation, terms, conditions and privileges of employment, or from continuing or maintaining any policy, practice, usage or custom of denying, abridging, withholding, conditioning, limiting or otherwise interferring with the rights of the plaintiff and others similarly situated to enjoy equal employment opportunities as secured by federal law.

(b) Requiring the defendants to institute immediately affirmative recruitment, hiring, training, transfer and promotion programs to eliminate the effects of discriminatory practices.

(c) Requiring the defendants to immediately reinstate plaintiff to the position she has been denied by reason of defendants' discriminatory practices, with seniority dating from the first instance of wrongful failure to place her in a position.

(d) Requiring the defendants to immediately give plaintiff the back pay and benefits she would have earned but for the unlawful discriminatory acts of the defendants, to be measured from the latter of her date of her employment by the defendants or the date on which the applicable law was effective.

(e) Prohibiting the defendants from retaliating against plaintiff or others for having complained of or supported claims of employment discrimination and directing that the defendants hereafter take no retaliatory actions detrimental to plaintiff or to any persons who have supported plaintiff's charges of discrimination.

3. Establish a mechanism for the enforcement of the injunctions herein by requiring the defendants to present to the court within thirty days of the issuance of the injunction a plan showing precisely and in detail how they will comply with the court's order that they cease and desist from policies, practices, customs and usages of discrimination against plaintiff or others similarly situated on account of their sex.

4. Direct that the defendants publish verbatim the findings and decisions herein on all defendants' bulletin boards and in all internal and external publications.

5. Award the plaintiff compensatory damages of One Hundred Thousand Dollars ($100,000.00).

6. Award the plaintiff the costs of the action herein, including reasonable attorney's fees.

7. Award the plaintiff damages by way of example against the defendants in an amount commensurate with the wrong and the

defendants' ability to pay.

8. Retain jurisdiction of this action until defendants have fully complied with the order of the court.

9. Award such other and further relief as may appear to this court just and proper.

Respectfully submitted,

Emmelyn Logan-Baldwin
Attorney for Plaintiff
Office and P.O. Address:
510 Powers Building
Rochester, New York 14614
Telephone: 716-232-2292

December 29, 1975
Rochester, New York

Exhibit A – Notice of Right to Sue attached to Complaint.

EQUAL EMPLOYMENT OPPORTUNITY COMMISSION
1 WEST GENESEE STREET
BUFFALO, NEW YORK 14202
(716) 842 - 5170

Re:

NOTICE OF RIGHT TO SUE
WITHIN 90 DAYS

In Case No.TBU5-0364 before the Equal Employment Opportunity Commission, United States Government.

Geraldine Sevor

v.

Litton Industries, Inc., McBee Industries, Sub.

YOU ARE HEREBY NOTIFIED THAT:

WHEREAS, this Commission has not filed a civil action with respect to your charge as provided by section 706(f)(1) of Title VII of the Civil Rights Act of 1964, as amended, 42 U.S.C. 2000e et seq; and,

WHEREAS, this Commission has not entered into a conciliation agreement to which you are a party;

THEREFORE, pursuant to s706(F) of Title VII, you may within 90 days of your receipt of this Notice, institute a civil action in the United States District Court having jurisdiction over your case.

Should you decide to commence judicial action, you must do so within 90 days of the receipt of this letter or you will lose your right to sue under Title VII.

If you are not represented by counsel and you are unable to obtain counsel, the Court may in its discretion, appoint an attorney to represent you.

Should you have any questions concerning your legal rights or have any difficulty in filing your case in court, please contact Mr. Kenneth M. Davidson of our office at (716) 842-5170.

Lloyd G Bell
LLOYD C. BELL, DISTRICT DIRECTOR

9/30/75
DATE

PLAINTIFF'S FIRST NOTICE TO PRODUCE, filed 12-31-75.

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF NEW YORK

GERALDINE SEVOR, Plaintiff, -vs- LITTON INDUSTRIES and McBEE SYSTEMS, a Subsidiary of LITTON INDUSTRIES, Defendants.	FIRST NOTICE TO PRODUCE-FRCP 34 CIVIL ACTION NO. 7

Pursuant to Rule 34 of the Federal Rules of Civil Procedure, plaintiff requests that you produce and permit plaintiff, by her attorney, to inspect and copy, at the offices of her attorney, Emmelyn Logan-Baldwin, 510 Powers Building, Rochester, New York, from 10:00 a.m. to 12 Noon and from 2:00 p.m. to 5:00 p.m. on February 18 and 19, 1976, the following:

1. The entire personnel file, including without intending to limit, time cards, employment applications, performance reviews, record of pay increases, of Geraldine Sevor, Keith Enstice, and all persons enrolled in the McBee Systems Basic Sales Training Program in Carlstadt, New Jersey for the training program beginning January 20, 1975.

2. The document and/or documents showing the name, sex, classification, pay rate, salary, advancement experience, prior experience, educational background and length of service for all office personnel in the district sales offices who were with Litton Automated Business Systems, Northeastern Region, and all those who are now with McBee Systems, Eastern Region, from 1965 to date.

PLAINTIFF'S FIRST NOTICE TO PRODUCE, filed 12-31-75.

3. Job descriptions and/or job specifications for all sales positions, including initial training programs and any on-the-job training at Litton Automated Business Systems, Northeastern Region, and at McBee Systems, Eastern Region, from 1965 to date.

4. The document and/or documents showing the method of appointment and qualification for appointment for all sales positions noted in the preceding paragraph.

5. All employment contracts signed by either Geraldine Sevor or Keith Enstice, from 1965 to date.

6. All writings of any nature whatsoever relating to the decision of the defendants to withdraw plaintiff's employment contract in January 1975.

7. All writings of any nature whatsoever relating to the recruitment, hiring, training and/or employment of Keith Enstice, from 1965 to date.

8. All writings of any nature whatsoever regarding changes in hiring policies of defendants due to economic factors in late 1974 and early 1975.

9. All writings of any nature whatsoever relating to the decision of the defendants to terminate Lynn Bodack and Chris Briggs, in the fall of 1974 from their sales positions in Buffalo, New York with the defendants.

10: All affirmative action programs of the defendants, including amendments or supplements thereto, from 1965 to date.

11. All EEO-1 reports, or similar reports filed by the defendants with any agency of the federal government.

12. All compliance reviews, audits of employment practices or any like documents prepared by any governmental agency of

PLAINTIFF'S FIRST NOTICE TO PRODUCE, filed 12-31-75.

the defendants' employment policies, from 1965 to date.

Emmelyn Logan-Baldwin
Attorney for Plaintiff
Office and P.O. Address:
510 Powers Building
Rochester, New York 14614
Telephone: 716-232-2292

December 29, 1975
Rochester, New York

BEST COPY AVAILABLE

STIPULATION, dated 1-26-76, and Order Extending Defendants' Time to Answer and Respond to Request to Produce.

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF NEW YORK

GERALDINE SEVOR,

Plaintiff,

-vs-

LITTON INDUSTRIES and MC BEE SYSTEMS, a subsidiary of Litton Industries,

Defendants.

STIPULATION EXTENDING TIME

Civ. No. 75-559

IT IS HERFBY STIPULATED AND AGREED by and between the undersigned, attorneys for plaintiff and defendants, that defendants' time to answer or otherwise move with respect to the complaint herein be extended to and including February 16, 1976, and to respond to plaintiff's request to produce documents be extended to and including March 4, 1976.

Dated: January 26, 1976

EMMELYN S. LOGAN-BALDWIN, Esq.

By: _____
Attorney for Plaintiff
510 Powers Building
Rochester, New York 14614
Tel. 716-232-2292

BRENNAN, CENTNER, PALERMO & BLAUVELT

By: _____
Attorneys for Defendants
500 Reynolds Arcade Building
Rochester, New York 14614
Tel. 716-546-6474

SO ORDERED this day of , 1976.

_____
U.S.D.J.

NOTICE OF MOTION PURSUANT TO RULE 12 OF THE FED. RULES OF CIVIL PROCEDURE.

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF NEW YORK

GERALDINE SEVOR,
76 Henrietta Street
Rochester, New York 14620

Plaintiff,

-vs-

LITTON INDUSTRIES
255 North Goodman Street
Rochester, New York 14607

and

McBEE SYSTEMS, A Subsidiary of
Litton Industries
255 North Goodman Street
Rochester, New York 14607

Defendants.

NOTICE OF MOTION PURSUANT TO RULE 12 OF THE FEDERAL RULES OF CIVIL PROCEDURE

Civ. Action No. 75-559

PLEASE TAKE NOTICE that the undersigned, on behalf of defendants Litton Industries, Inc. and McBee Systems, a Division of Kimball Systems, which is a Division of Litton Business Systems, Inc., incorrectly sued as "Litton Industries" and "McBee Systems, A Subsidiary of Litton Industries", will bring the annexed motion pursuant to Rule 12 of the Federal Rules of Civil Procedure before this Court at the United States Courthouse in Rochester, New York on the 23rd day of February, 1976, at 10 o'clock A.M. of that day or as soon thereafter as counsel can be heard.

Dated: February 10, 1976

NOTICE OF MOTION PURSUANT TO RULE 12 OF THE FED. RULES OF CIVIL PROCEDURE.

JEANETTE M. THOMAS, ESQ.
360 North Crescent Drive
Beverly Hills, California 90210

and

BRENNAN, CENTNER, PALERMO & BLAUVELT

By: Anthony R. Palermo
Anthony R. Palermo, Esq.
A Member of the Firm

Attorneys for Defendants
Office and Post Office Address
500 Reynolds Arcade Building
Rochester, New York 14614
(716) 546-6474

TO: EMMELYN LOGAN-BALDWIN, ESQ.
Attorney for Plaintiff
Office and Post Office Address
510 Powers Building
Rochester, New York 14614
(716) 232-2292

DEFENDANTS' MOTION TO DISMISS, dated 2-10-76, and Supporting Affidavit of Anthony R. Palermo, Esq., sworn to 2-10-76.

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF NEW YORK

GERALDINE SEVOR,
76 Henrietta Street
Rochester, New York 14620

Plaintiff,

-vs-

LITTON INDUSTRIES
255 North Goodman Street
Rochester, New York 14607

and

McBEE SYSTEMS, A Subsidiary of
Litton Industries
255 North Goodman Street
Rochester, New York 14607

Defendants.

MOTION TO DISMISS

Civ. No. 75-559

The defendants, Litton Industries, Inc. and McBee Systems, a Division of Kimball Systems, which is a Division of Litton Business Systems, Inc., incorrectly sued as "Litton Industries" and "McBee Systems, A Subsidiary of Litton Industries", move the Court as follows:

1. To dismiss the First and Second causes of action of plaintiff's complaint because they fail to state a claim against said defendants upon which relief can be granted.

2. To dismiss the First cause of action of plaintiff's complaint for lack of jurisdiction with respect to all allegations under Title VII of the Civil Rights Act of 1964, other than failure to hire, because plaintiff failed to file with the Equal Employment Opportunity Commission within the

statutory time required.

3. To dismiss the Second cause of action of plaintiff's complaint for lack of jurisdiction because the asserted cause of action appears on the face of the complaint not to have been commenced within a period of two years from the time when the alleged claim accrued and is thus barred by 29 U.S.C. §255 (a) and no facts are alleged to support application of a longer statute of limitation, or in the alternative, to compel plaintiff to furnish a more definite statement of the nature of her claims in said Second cause of action because the allegations are so vague and ambiguous that defendants should not reasonably be required to prepare a responsive pleading unless said defendants are informed more definitely as to the essential factual matters, including but not limited to (1) the time when and the places where the alleged unlawful acts are alleged to have been performed; and (2) the names of individuals involved; (3) the manner and respects in which said defendants allegedly deprived the plaintiff of equal employment benefit and wages referred to and (4) the facts upon which plaintiff will rely to support any claimed willful violation.

4. To dismiss the First and Second causes of action insofar as they seek to obtain relief on behalf of a class because:

a. The complaint fails to state the necessary allegations required to proceed as a class action under Rule 23, and

b. Plaintiff has failed to obtain written consent of any employee member of the class and file the same with the Court pursuant to applicable provisions of law.

5. To set aside purported service upon Litton Industries, Inc. and to dismiss the complaint against Litton Industries, Inc. for lack of jurisdiction over the person of said Litton Industries, Inc.

6. And for such other and further relief as the Court may deem just and proper.

Dated: February 10, 1976

JEANETTE M. THOMAS, ESQ.
360 North Crescent Drive
Beverly Hills, California 90210

and

BRENNAN, CENTNER, PALERMO & BLAU, LLP

By: Anthony R. Palermo
Anthony R. Palermo, Esq.
A Member of the Firm

Attorneys for Defendants
Office and Post Office Address
500 Reynolds Arcade Building
Rochester, New York 14614
(716) 546-6474

TO: EMMELYN LOGAN-BALDWIN, ESQ.
Attorney for Plaintiff
Office and Post Office Address
510 Powers Building
Rochester, New York 14614
(716) 232-2292

DEFENDANTS' MOTION TO DISMISS, dated 2-10-76, and Supporting Affidavit of Anthony R. Palermo, Esq., sworn to 2-10-76.

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF NEW YORK

GERALDINE SEVOR,
76 Henrietta Street
Rochester, New York 14620

Plaintiff,

-vs-

LITTON INDUSTRIES
255 North Goodman Street
Rochester, New York 14607

and

McBEE SYSTEMS, A Subsidiary of
Litton Industries
255 North Goodman Street
Rochester, New York 14607

Defendants.

AFFIDAVIT

STATE OF NEW YORK)
COUNTY OF MONROE) SS:

ANTHONY R. PALERMO, being duly sworn, deposes and says:

1. I am an attorney admitted to practice in the State of New York and in this Court,and a member of the firm of Brennan, Centner, Palermo & Blauvelt, attorneys retained by Litton Industries, Inc. and Litton Business Systems, Inc. to represent them in the above-entitled matter. This affidavit is submitted in support of a motion to dismiss the complaint herein.

2. Upon information and belief, on or about January 5, 1976, the summons and complaint herein was served

upon David Miller, a Sales Representative for McBee Systems, a Division of Kimball Systems, a Division of Litton Business Systems, Inc. Litton Business Systems, Inc. is a New York Corporation and a wholly owned subsidiary of Litton Industries, Inc.

3. On or about January 26, 1976, on behalf of the defendants herein, your deponent secured and executed a stipulation extending time to answer or move with respect to the complaint herein to and including February 10, 1976.

4. Upon information and belief, based upon conversations on February 9, 1976 with Jeanette M. Thomas, Esq., an attorney with the Law Department of Litton Industries, Inc., no copy of the summons and complaint was ever served upon any agent of Litton Industries, Inc.,and Litton Industries, Inc. does not maintain any office or transact any business in the Western District of New York. Upon information and belief, Litton Industries, Inc. is a Delaware Corporation with principal place of business in Beverly Hills, California, and is not now and never has been qualified to do business in the State of New York. Litton Industries, Inc. has never maintained an office or mailing address in the State of New York and has no bank accounts in the State of New York, and has not held company meetings in New York and does not own, possess or use any property, real or personal, in the State of New York, and never had a general agent for service of process in the State of New

York. All the books and records of Litton Industries, Inc. are located at corporate headquarters in Beverly Hills, California, and it has never transacted any business in the State of New York.

5. Your deponent also talked to David Miller on February 9, 1976, who confirmed that he is employed only by McBee Systems, and not by Litton Industries, Inc.

6. Upon information and belief, prior to August 31, 1973, plaintiff was employed by Litton Automated Business Systems, a Division of Litton Business Systems, Inc. Upon information and belief, plaintiff submitted a letter of resignation on or about July 16, 1973. At no time was plaintiff ever employed or recruited by Litton Industries, Inc.

7. Upon the foregoing, it is respectfully submitted Litton Industries, Inc. is not a proper party to this lawsuit, and this Court has no jurisdiction over the person of the defendant Litton Industries, Inc. in that purported service of the summons and complaint is not good and sufficient.

WHEREFORE, your deponent respectfully requests the Court to declare the purported service upon Litton Industries, Inc. null and void and to dismiss the complaint as to Litton Industries, Inc., and to grant the relief requested in the

attached notice of motion, and for such other and further relief as the Court may deem sufficient.

ANTHONY R. PALERMO

Sworn to before me this
10th day of February, 1976.

Notary Public
NANCY ELLEN SCOTT
Public in the State of
MONROE COUNTY
Commission Expires March 30, 1977

DEFENDANTS' AFFIDAVIT OF ROBERT H. LENTZ, sworn to 2-23-76.

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF NEW YORK

GERALDINE SEVOR,
76 Henrietta Street
Rochester, New York 14620

Plaintiff,

Civ. Action No. 75-559

vs.

AFFIDAVIT

LITTON INDUSTRIES
255 North Goodman Street
Rochester, New York 14607

and

McBEE SYSTEMS, A Subsidiary of
Litton Industries
255 North Goodman Street
Rochester, New York 14607

Defendants.

STATE OF CALIFORNIA)
) ss:
COUNTY OF LOS ANGELES)

I, ROBERT H. LENTZ, being first duly sworn, hereby depose and say:

1. I am a resident of the County of Los Angeles, State of California.

2. I am a Vice President and Chief Counsel of Litton Industries, Inc. ("Litton"), and I have held these positions at all times since November 15, 1967. In these capacities I am fully familiar with the operations of Litton, the means and methods by which it conducts and transacts business, its books, records and corporate documents.

3. I am familiar with the within action. This affidavit is made in support of Litton's Motion to Dismiss. I have personal knowledge of the facts set forth in this Affidavit. I am competent to testify as a witness, and if called upon to testify would testify to the truth of the facts contained herein.

DEFENDANTS' AFFIDAVIT OF ROBERT H. LENTZ, sworn to 2-23-76.

4. Litton is a Delaware corporation, having its principal place of business in Beverly Hills, Los Angeles County, California. Litton is not now and never has been qualified to do business in the state of New York.

5. Litton has never maintained an office or mailing address in New York and holds no company meetings in New York.

6. Litton does not own, use or possess any real property in New York and has not owned, used or possessed any real property in New York in the past.

7. Litton has never had a general agent for service of process in the State of New York, nor does it have a special agent in New York, such as the Secretary of State, for service of process in connection with the dispute which is the subject matter of this action.

8. All of Litton's books and records are maintained at its office in Beverly Hills, California. None are kept in New York.

9. Litton has not transacted any business in New York which, in any way, relates to the dispute which is the subject matter of this action; it does not maintain an employment office in New York; it does not regularly do or solicit business in New York or engage in any operations in the State of New York or derive substantial revenue from goods used or consumed or services rendered in New York.

Executed this 23rd day of February, 1976 at Beverly Hills, California.

Robert H. Lentz

Robert H. Lentz

Sworn to before me this 23rd day of February, 1976.

Magda Ganz

Notary Public

OFFICIAL SEAL
MAGDA GANZ
NOTARY PUBLIC - CALIFORNIA
PRINCIPAL OFFICE IN
LOS ANGELES COUNTY
My Commission Expires March 27, 1976

DEFENDANTS' RESPONSES AND OBJECTIONS, dated 3-4-76 to Plaintiff's First Notice to Produce.

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF NEW YORK

GERALDINE SEVOR,

Plaintiff,

-vs-

LITTON INDUSTRIES and McBEE SYSTEMS, a Subsidiary of LITTON INDUSTRIES,

Defendants.

RESPONSES AND OBJECTIONS TO PLAINTIFF'S FIRST NOTICE TO PRODUCE

Civil No. 75-559

Litton Industries, Inc. (hereafter "Litton") and McBee Systems, A Division of Kimball Systems, which is a division of Litton Business Systems, Inc. (hereafter "Business Systems"), incorrectly sued as "Litton Industries" and "McBee Systems, A Subsidiary of Litton Industries", defendants, by their attorneys, Brennan Centner, Palermo & Blauvelt, hereby submit their Responses and Objections to Plaintiff's First Notice to Produce Pursuant to Rule 34 of the Federal Rules of Civil Procedure.

GENERAL OBJECTIONS AND LIMITATIONS

A. Litton and Business Systems, incorrectly sued as "Litton Industries" and "McBee Systems, A Subsidiary of Litton Industries", object generally to plaintiff's request in its entirety on the grounds that it is premature and that justice requires final determination of a pending motion to dismiss the complaint prior to responding to the discovery sought. Until such determination it is impossible to decide questions of relevance.

B. The summons and complaint herein were served on January 5, 1976 upon David Miller, a Sales Representative employed by McBee Systems at Rochester, New York. On the same date, the instant First Notice to Produce was also served on Miller, who is not an employee or agent of Litton. No copy of the summons and complaint or the First Notice to Produce was ever served on Litton or any agent, in New York or elsewhere.

C. By notice dated February 10, 1976, defendants, Litton and Business Systems, moved pursuant to Rule 12 of the Federal Rules of Civil Procedure, for an order dismissing the first and second causes of action in plaintiff's complaint and setting aside the purported service upon Litton Industries, Inc. The motion to dismiss and all supporting papers including affidavits of Anthony R. Palermo and Robert H. Lentz are incorporated herein by reference. The motion to dismiss the complaint asserts failure to state a cause of action, lack of jurisdiction of the subject matter, statute of limitations, as well as lack of jurisdiction over the person of Litton Industries, Inc. The original motion was returnable February 23, 1976 but was adjourned at the request of plaintiff's counsel to March 22, 1976.

D. Litton and Business Systems should not be directed to produce any items requested by the plaintiff until the defendants' motion to dismiss is reviewed by the Court, and the issues involved are resolved. The pursuit of disclosure and consequential record searching, production, inspection and

copying is premature until relevancy can be ascertained. It is respectfully submitted that if discovery is pursued prior to determination of the motion to dismiss, Litton and Business Systems will suffer annoyance, oppression, undue burden and expense.

E. Plaintiff has incorrectly named "Litton Industries" and "McBee Systems, A Subsidiary of Litton Industries" as parties defendant. However, plaintiff was never employed by Litton Industries and McBee Systems is not a subsidiary of Litton Industries. Therefore, Litton objects to plaintiff's attempt to compel production of the requested documents on the ground of the irrelevance. In addition, it appears that some of the documents sought relate to matters involving other parties.

F. In stating their specific responses and objections, defendants do not waive the attorney-client work product or other privilege or immunity from disclosure which may attach to information contained in requested documents, and which may be raised in subsequent responses to particular requests, nor do they concede the relevance or materiality of documents requested or the subject matter to which they refer.

G. Material which is legally privileged by the attorney-client relationship or by being attorney's work product or as material prepared in anticipation of and for litigation will not be produced.

H. These responses and objections are made by defendants subject to and without in any way waiving or intending to waive, but on the contrary intending to reserve and reserving, the right to object to other discovery procedures involving or relating to the subject matter of information contained in requested documents.

I. To the extent that plaintiff's request seeks information that defendants consider confidential, defendants reserve the right to decline to provide such information without an adequate protective order.

J. Subject to Rule 34 A, defendants will produce only documents which are currently in their possession, custody or control.

K. Defendants object to the requests of plaintiff insofar as they might require production of every identical copy of each document.

L. Defendants will search only likely sources which are known to contain or reasonably expected to contain responsive documents.

M. Defendants object to plaintiff's request insofar as it seeks materials dated from 1965 to date on grounds of relevancy The subject matter of the first cause of action in plaintiff's complaint relates to an employment application of December, 1974 or January, 1975 submitted to McBee Systems. Plaintiff was not hired or employed at that time by McBee and

has never been employed by Litton Industries, Inc.

OBJECTIONS AND RESPONSES TO SPECIFIC REQUESTS IN PLAINTIFF'S FIRST NOTICE TO PRODUCE

1. Regarding paragraph 1 of plaintiff's notice, neither Litton nor Business Systems possess records of plaintiff's 1974 or 1975 employment application. Plaintiff's personnel file, time cards, employment applications, performance reviews and record of pay increases relating to plaintiff's previous employment with Litton Automated Business Systems, a Division of Litton Business Systems, Inc., are not relevant or material to the instant suit. Similar records for "Keith Enstice and all persons enrolled in the McBee Systems Basic Sales Training Program in Carlstadt, New Jersey for the training program beginning January 20, 1975" should not be produced because they are confidential records of third parties and are not relevant or material to plaintiff's complaint. In addition, plaintiff's request does not identify specific documents desired and is therefore defectively overbroad.

2. Litton and Business Systems object to production of documents described at paragraph 2 on the basis of relevance. In addition, it is not known whether or to what extent and in what form the documents described may exist. Production of the documents generally described would be a burden and a hardship. The documents described relate to persons and

employees not parties to this plaintiff's complaint and the disclosure of their confidential historic personnel records would serve no relevant purpose.

3 - 4. Litton and Business Systems object to the production of items described in paragraph 3 and 4 of plaintiff's notice because matters described therein lack relevance in time and function to topics and parties named in plaintiff's complaint. Documents denominated "job descriptions and/or job specifications" as set forth in paragraph 3, and "method of appointment" and "qualification for employment" as set forth in paragraph 4, are not known to exist. The descriptive wording in this paragraph is not specific and is overbroad. Searching for and producing documents in satisfaction of this paragraph would be a great burden and hardship.

5. Litton and Business Systems object to paragraph 5 of plaintiff's notice because it calls for contracts from 1965 to date, a time frame that is not relevant to complaint. Litton and Business Systems cannot produce any contract signed by Geraldine Sevor in 1974 or 1975 because they do not have such a contract.

6. Litton and Business Systems respond to paragraph 6 of plaintiff's notice by stating that the writings requested are not known to exist prior to January, 1975. With respect to any writings prepared after January, 1975, or after plaintiff commenced proceedings relating to the subject matter of the complaint

herein or proceedings before the State Division of Human Rights, State of New York, objection is made on the ground that they are papers prepared in anticipation of and in preparation for litigation.

7. Litton and Business Systems object to paragraph 7 of plaintiff's notice for reasons stated above and in response to paragraph 5 of plaintiff's notice. Writings relating to the training and/or employment of Keith Enstice will be furnished if the complaint is not dismissed and confidentiality is waived by Mr. Enstice.

8. Regarding paragraph 8 of plaintiff's notice, Litton and Business Systems agree to produce such writings which may exist regarding changes in hiring policies of defendants due to economic factors in late 1974 and early 1975 providing the complaint is not dismissed by the Court.

9. Defendants object to paragraph 9 of plaintiff's notice because the subject matter in paragraph 9 is irrelevant to plaintiff's complaint. The request fails to identify specific documents, is too general and too broad and calls for disclosure of confidential records of individuals not parties to this action.

10-11-12. Litton and Business Systems object to paragraphs 10, 11 and 12 of plaintiff's notice on the ground that the subject matter described therein is irrelevant to plaintiff's complaint. The request in paragraph 10 is not specific. Docu-

ments from 1965 to date are irrelevant to the plaintiff's complaint. It is respectfully submitted plaintiff seeks an unrestrained, general, exploratory search of the records of Litton and Business Systems.

Dated: March 4, 1976

Respectfully submitted,

JEANETTE M. THOMAS, ESQ.
360 North Crescent Drive
Beverly Hills, California 90210

BRENNAN, CENTNER, PALERMO & BLAUVELT

By: _____
Anthony R. Palermo, Esq.
A Member of the Firm
Attorneys for Defendants
Office and Post Office Address
500 Reynolds Arcade Building
Rochester, New York 14614
Tel. (716) 546-6474

TO: EMMELYN LOGAN-BALDWIN, ESQ.
Attorney for Plaintiff
Office and Post Office Address
510 Powers Building
Rochester, New York 14614

DEFENDANTS' RESPONSES AND OBJECTIONS, dated 3-4-76 to Plaintiff's First Notice to Produce.

AFFIDAVIT OF SERVICE

STATE OF NEW YORK)
COUNTY OF MONROE) SS:

JUDITH C. PEACOCK, being duly sworn, deposes and says: deponent is not a party to the action, is over 18 years of age and resides at Rochester, New York.

On March 4, 1976 at approximately 1:15 P.M. deponent served the within Affidavit upon Emmelyn Logan-Baldwin, Esq., attorney for the plaintiff in this action, by delivering a true copy thereof to Mary Lechner, a secretary employed at the law office of Emmelyn Logan-Baldwin, Esq.

Judith C. Peacock
Judith C. Peacock

Sworn to before me this
___ day of March, 1976.

Notary Public

AMENDED COMPLAINT, dated 3-18-76.

UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF NEW YORK

GERALDINE SEVOR,

Plaintiff,

-vs-

LITTON INDUSTRIES, LITTON BUSINESS SYSTEMS, INC. and MCBEE SYSTEMS, a Subsidiary of Litton Industries,

Defendants.

AMENDED COMPLAINT

Plaintiff hereby amends her complaint herein as follows:

1. The caption is amended to state the full title of Litton Industries, Litton Industries, Inc. Further, the caption is amended to include Litton Business Systems, Inc., formerly Litton Automated Business Systems.

2. References in the complaint to Litton Industries are amended to read Litton Industries, Inc. References in the complaint to Litton Automated Business Systems are amended to read Litton Automated Business Systems and/or Litton Business Systems, Inc.

3. A new sentence is added to numbered paragraph 4, as follows: "Upon information and belief, defendant Litton Business Systems, Inc. is a division of Litton Industries, Inc. and/or a wholly owned subsidiary of Litton Industries, Inc.; Litton Business Systems, Inc. is known as or was known as Litton Automated Business Systems."

Emmelyn Logan-Baldwin
Attorney for Plaintiff
Office and P.O. Address:
510 Powers Building
Rochester, New York 14614

March 18, 1976

CERTIFICATE OF SERVICE

I hereby certify that I have served the foregoing Amended Complaint on the defendants by my causing a copy thereof to be delivered to the office of attorneys for the defendants, Brennan, Center, Palermo & Blauvelt, 500 Reynolds Arcade Building, Rochester, New York this 19th day of March 1976.

Emmelyn Logan-Baldwin
Attorney for Plaintiff
Office and P. O. Address:
510 Powers Building
Rochester, New York 14614

PLAINTIFF'S NOTICE OF CROSS-MOTION, dated 3-18-76, to Compel Discovery and Opposition to Defendants' Motion to Dismiss.

UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF New York

GERALDINE SEVOR, Plaintiff -vs- LITTON INDUSTRIES and MCBEE SYSTEMS, a Subsidiary of Litton Industries, Defendants.	NOTICE OF CROSS-MOTION TO COMPEL DISCOVERY; OPPOSITION TO DEFENDANTS' NOTICE TO DISMISS

PLEASE TAKE NOTICE that upon plaintiff's complaint, Notice to Produce, the Affidavit of Geraldine Sevor sworn March 18, 1976, the Affirmation of Emmelyn Logan-Baldwin dated March 18, 1976 and upon all the papers and proceedings heretofore had herein, plaintiff will move at a Motion Term of this court on March 22, 1976 at Federal Building, State Street, Rochester, New York at 10:00 a.m. or as soon thereafter as counsel can be heard for an order compelling the defendants to produce documents pursuant to a Notice to Produce duly served herein. Plaintiff will request such other and further relief as to the court may seem just and proper.

PLEASE TAKE FURTHER NOTICE that upon the same papers and at the same time and place, plaintiff will oppose defendants' motion pursuant to Rule 12, dated February 10, 1976.

Emmelyn Logan-Baldwin
Attorney for Plaintiff
Office and P.O. Address:
510 Powers Building
Rochester, New York

March 18, 1976

AFFIDAVIT OF GERALDINE SEVOR IN SUPPORT OF CROSS-MOTION TO COMPEL DISCOVERY; OPPOSITION TO DEFENDANTS' MOTION TO DISMISS.

UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF NEW YORK

GERALDINE SEVOR, Plaintiff, -vs- LITTON INDUSTRIES and MONROE SYSTEMS, a Subsidiary of Litton Industries, Defendants.	AFFIDAVIT IN SUPPORT OF CROSS-MOTION TO COMPEL DISCOVERY; OPPOSITION TO DEFENDANTS' MOTION TO DISMISS

STATE OF NEW YORK
COUNTY OF MONROE
CITY OF ROCHESTER SS:

GERALDINE SEVOR, being duly sworn, according to law, deposes and says:

1. I am the plaintiff in this lawsuit. I submit this affidavit in support of my motion to compel discovery and in opposition to defendants' motion to dismiss.

2. I submit that my motion to compel the defendants to produce documents pursuant to notice duly served on them should be granted. All of the documents that I have requested to be produced are, as a matter of law, necessary and relevant to my claims of employment discrimination. I am informed and believe, from discussions with my attorney, that these papers were properly served on the defendants herein and that there is no basis for the defendants to claim that Litton Industries, Inc. has not been properly served or to claim

that Litton Industries, Inc. does not do business in New York or is not subject to service of process in New York. I am further informed and believe, from discussions with my attorney, that my complaint properly states claims for violation of the Equal Pay Act and Title VII of the Civil Rights Act of 1964 and that those claims have been properly and timely filed. The motion of the defendants to dismiss my claims and/or require that I serve a more definite statement of my claims should, therefore, be denied.

3. As I set forth in my complaint, I was an employee of defendant Litton Industries, Inc. for nine years from 1964 until 1973. I was rehired by Litton Industries in December of 1974 with my work intended to be performed with the division of Litton Industries known at that time as McBee Systems. Throughout my employment association with defendant Litton Industries, Inc. there has been different nomenclature used by the company to describe its various divisions and operations. But my employer, I have understood, has always been Litton Industries, Inc.

4. For example, when I was first employed with Litton in 1965 I worked for a division called Royal-McBee. Shortly thereafter, Litton split Royal-McBee into two other divisions which it then called the Royal Typewriter Co., Division of Litton Industries and McBee Systems, Division of Litton Industries.

AFFIDAVIT OF GERALDINE LEVOR IN SUPPORT OF CROSS-MOTION TO COMPEL DISCOVERY; OPPOSITION TO DEFENDANTS' MOTION TO DISMISS.

5. About 1968, Litton Industries changed the name of its McBee Systems Division to Litton Automated Business Systems, Division of Litton Industries, Inc. The product lines from McBee Systems and the automated equipment product lines from another Litton Industries Division, Monroe International were then consolidated under the Litton Division, Litton Automated Business Systems.

6. About 1973, Litton Industries, Inc. reorganized the Litton Automated Business Systems Division making a McBee Systems Division and transferring the computer line of Litton Automated Business Systems to another Litton Industries, Inc. division, Sweda International.

7. The corporate structure of Litton Industries, Inc. with its various divisions is outlined in the annual report of Litton Industries, Inc. for the fiscal year ending July 31, 1975, a copy of which is being submitted to the court as Exhibit A. On page 7 of this report, the company refers to part of its current restructuring of its divisions observing "As part of the program, the operations of the former Litton ABS (Automated Business Systems) Division were integrated into the Sweda International and Kimball Systems divisions in September 1974."

8. On page 57 of the annual report of Litton Industries, Inc., the company outlines that it has principal plants, offices and commercial centers. The company emphasizes that

72.3% of its properties and operations are located in eight states, among which i the State of New York. On page 59 of this report, the company summarizes the "major" divisions of the company.

9. An examination of any information source on American corporations, for example, Standard and Poors Register, 1976, Volume 1, Moody's Industrial Manual, 1975, Volume 2 or Directory of Corporate Affiliations, 1976, copies of which are attached hereto as Exhibit B, clearly shows that Litton Industries, Inc. is a company with multiple divisions and/or wholly owned subsidiaries. The management of Litton Industries, Inc. is interchangeable with the management of its divisions and/or wholly owned subsidiaries. For example, the officers and directors of Litton Business Systems, Inc., a subsidiary of Litton Industries, Inc. (a New York Corporation with a New York City, New York address) are listed by Standard and Poor's Register, 1976, Volume 1. All of these persons are also listed on page 60 of the Litton Industries Inc., Annual Report as officers and directors of Litton Industries, Inc.

10. As an employee of Litton Industries, Inc. I along with other employees of Litton's various divisions have had opportunity to participate in Litton Industries, Inc. employee benefits. I attach hereto as Exhibit C a copy of a notice of purchase on a Litton Industries Employee's Stock Purchase Plan for one of my fellow workers, John M. Dixon.

I also participated in this Litton Industries Stock Purchase Plan as an employee and attach hereto and make a part hereof as Exhibit D, a copy of record of sale of Litton Industry stock which I had acquired through this employee stock purchase plan.

11. If one looks in the Rochester Telephone Director for a listing of Litton, one finds a listing which reads "Litton ABS (see McBee Systems)." Upon reading the newspaper, The Batavia Daily News, on March 17, 1976, I noted that Sweda International holds itself out as a division of Litton Industries when it solicits for new employees. See Exhibit E.

11a. I understand from talking with my attorney that service of papers in proceedings on employment discrimination before the New York State Division of Human Rights and involving these same defendants and myself were served in the same fashion as the complaint and notice to produce in this case. I am informed that there has been no claim made that the process was ineffective or not properly served. In fact, as my attorney sets forth herein, attorneys for Litton Industries, Inc. directed that an appearance be made in those proceedings on behalf of Litton Industries, Inc.

12. The service of the complaint and notice to produce in this action was made on David M. Miller, an employee of Litton Industries who is located at 255 North Goodman Street, Rochester, New York in the McBee Systems Division of Litton Industries, Inc. A copy of the Marshal's return of service is attached hereto and made a part hereof as Exhibit F. As set forth therein, Mr. Miller accepted service on behalf of Litton Industries and described himself to the Marshal as the

"Branch Manager".

13. I submit therefore that there is no basis for the claim of the defendants that they do not maintain any office for doing business in New York, that they do not transact any business in New York, that they don't own, possess or use any real property in New York-the company's annual report simply says otherwise. I know from my own experience as an employee otherwise. The court should therefore reject the argument of the defendants that the service on Litton Industries, Inc. should be set aside.

14. While, as I note above, I have named the defendants properly and I have served the defendants correctly, I serve herewith my Amended Complaint showing the full title, Litton Industries, Inc. and naming in the caption, as I have already done throughout the body of the complaint, Litton Business Systems, Inc., previously Litton Automated Business Systems.

15. I am informed and believe from talking with my attorney that my claims herein under the Equal Pay Act and Title VII of the Civil Rights Act of 1964 are properly stated. I believe that these claims are pleaded like other similar claims which courts have found to be sufficiently stated.

16. Further, I am informed and believe, from talking with my attorney that my claims under the Equal Pay Act and Title VII of the Civil Rights Act of 1964 have been timely filed. My claims are of continuing, company-wide employment

discrimination beginning with my employment and continuing throughout my employment relationship with the defendants. The discrimination continues to date with the defendants' discriminatory termination, solely because of my sex.

17. I filed my claims of the pattern, practice, custom and usages of employment discrimination well within the time periods I understand are applicable to claims under the Equal Pay Act or Title VII of the Civil Rights Act of 1964. All my claims under the Equal Pay Act were filed within two years with the filing of this complaint on December 30, 1975. My claims of employment discrimination were first filed, pursuant to Title VII of the Civil Rights Act of 1964, with the New York State Division of Human Rights on or about February 24, 1975; I cross filed those claims with the Equal Employment Opportunity Commission on or about March 27, 1975. My claims of company-wide, pattern and practice discrimination were therefore filed well within the three hundred (300) days of the occurrance of those acts. I brought this lawsuit within ninety (90) days of receiving my Right to Sue Notice from the Equal Employment Opportunity Commission. I understand, therefore, that there is no basis for defendants' claims that my claims are not "timely".

18. Further, I believe from conversations with my attorney that defendants' allegations respecting the "class claims" are without merit. I do not seek to constitute this

lawsuit a class action. I do, however, claim that the employment discrimination practiced by the defendants is company-wide discrimination; the defendants engage in a pattern, practice, policy, custom and usage of discriminating against its women employees. I am informed and believe from talking with my attorney that courts have held that an employment discrimination complaint which attacks patterns, practices, customs and usages of employment discrimination is by definition a "class" complaint. An employment policy obviously has an impact on more than one employee. I allege that the employment policies of the defendants are discriminatory against me and other women similarly situated. There is, therefore, I understand, nothing unusual or improper about the allegations but rather the allegations of my complaint as to company-wide, pattern and practice discrimination are typical of similar allegations in other complaints which have been litigated under the Equal Pay Act or Title VII.

19. I believe, therefore, that defendants' various motions as to service and as to the complaint should be denied. My cross-motion to compel production of documents pursuant to the Notice to Produce served at the time of service of the complaint herein should be granted. There should be no further delay in proceeding with discovery to which I am entitled in

an employment discrimination case.

20. I am informed from discussions with my attorney that the documents herein requested are relevant as a matter of law in an employment discrimination case. I underscore that these requests in the Notice to Produce are initial requests only and do not in any way represent . . the requests to which I am entitled prior to trial of this case.

21. The requests relate in time, in some instances, from 1965 to date. I am informed from talking with my attorney that I am entitled to documentary proof which pre-dates the effective date of Title VII, 1965,as well as documentary proof from the effective date of the act to the trial of the lawsuit. Thus, in making a request for documents initially from 1965 to date, in some instances, I am not even requesting production of the scope to which I am entitled. I understand that courts have held that whether an employment discrimination case be termed an "individual" complaint or a "class" complaint, I am entitled to documentary evidence showing the employment scene,to statistical,pattern and practice evidence. This evidence is produced prior to the effective date of the act as well as from the effective date of the act to trial because courts have held that past discriminatory practices have a present effect.

22. In item 1 of the notice, I request personnel files of myself and other employees with whom my employment experience should be compared. I am informed and believe from

talking with my attorney that the personnel file materials, such as those described in demand 1 of the notice, are the central documents with which one proves denial of equal terms, conditions and privileges of employment. The persons whose files are requested in demand 1 are those persons who received the training and job opportunities which the defendants promised to me and contracted for but which were later denied to me solely because of sex. From talking with my attorney, I do not believe that there is any basis to suggest that the records requested are "confidential"- I understand that personnel files are routinely used in employment discrimination case proof. Proof in an employment discrimination case cannot rest on defendants' securing the "permission" of their employees to release certain files. The personnel files are maintained by the defendants and are in the possession of the defendants; they are relevant, in fact central to my case, and must be produced.

23. In item 2 of the notice, I request documentation on employees of the defendants in the areas where I have worked or was to work. This documentation is again central documentation to show the denial to me of equal terms, conditions and privileges of employment solely because of my sex. The employment experience of the men employees will be compared with the employment experience of myself and other women employees. I am informed from talking with my attorney, that the documentation requested in item 2 of the notice frequently

is maintained by companies in computer printout form. The information is therefore readily available, in most instances. Further, even if the information were to be obtained from personnel files, there would be no difficulty in producing such information since, I understand, that there would be about 85 employees of Litton Automated Business Systems Northeastern Region and only about 76 employees of the McBee Systems Eastern Region.

24. In items 3 and 4 of the notice, I request documentation relating to job descriptions and appointment and qualification data in the positions where I have worked or was to work. This data is central to showing the difference between the work I and other women were expected to perform and the work we actually performed as contrasted to that data for men employees.

25. In item 5 of the notice I request the employment contract I signed and the employment contract signed by the man who the defendants hired in my place. The production of these contracts is central to my showing that the defendants terminated me solely because of my sex. I understand from talking with my attorney that while they can properly claim that such a document is non-existent, the document nevertheless would remain subject to production and the defendants would be required to explain under oath the non-existence of the document. There is no question that that document was signed by me and was at one time in the possession

of the defendants.

26. In items 6 and 7 of the notice, I request information regarding defendants' termination of me and replacing my employment with the man, Keith Enstice. I am informed from talking with my attorney, that defendants cannot properly make a blanket claim of any of these materials being materials prepared in anticipation of and in preparation for litigation simply because they have dates subsequent to my filing my claims. To sustain such claim, the documents in question would have to be identified and their substance examined. I am certainly entitled to all these materials, including all those relating to recruitment, hiring, training and/or employment of the man, Keith Enstice in my place.

27. Apparently the defendants plan on producing all of the materials requested in item 8 of the notice.

28. The materials in item 9 with respect to the termination of other women employees are directly related to my claims that the defendants deny women equal employment opportunities. I allege, for example, in paragraph 21 of the complaint that one of the reasons defendants have suggested that I was terminated and a male hired in my place was because the company didn't want to take another chance on women doing sales work because two previous women employees in the Buffalo area had not "worked out." In item 9 I am requesting the personnel files on these two women employees so that allegation can be substantiated.

AFFIDAVIT OF GERALDINE SEVOR IN SUPPORT OF CROSS-MOTION TO COMPEL DISCOVERY; OPPOSITION TO DEFENDANTS' MOTION TO DISMISS.

29. In items 10, 11 and 12 of the Notice to Produce, I request the affirmative action programs of the defendants, EEO-1 reports and compliance reviews, audits of employment practices or like documents. The defendants are required to prepare these documents in connection with federal laws relating to providing equal employment opportunities. I know the company has affirmative action plans not only because federal law requires them to have the same but because the company affirmatively states on an employment application which they have represented to the Division of Human Rights that is a current application, that they have an affirmative action plan. The affirmative action plans, EEO-1 reports, compliance reviews, audits and like documents contain analyses of defendants' employment practices and in particular an analysis of the employment of women. These documents are central to showing the employment picture of the defendants to which I am entitled.

30. I request,therefore, that the court direct that the defendants produce the documents requested in my Notice to Produce.

Geraldine Sevor
GERALDINE SEVOR

Sworn to before me this 18th
day of March, 1976.

Exhibit A – Annual Report for the Fiscal Year Ended 7-31-75 attached to Sevor Affidavit.

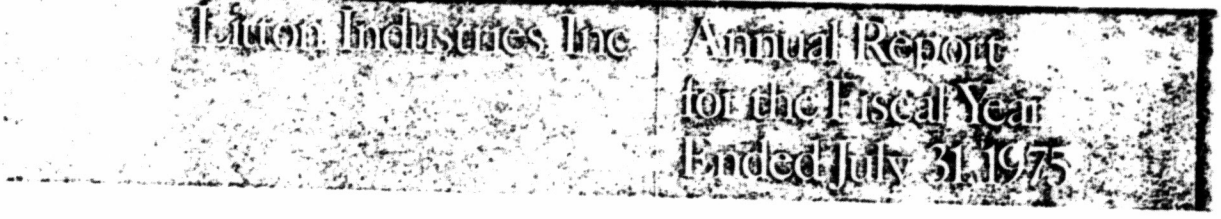


Exhibit A – Annual Report for the Fiscal Year Ended 7-31-75 attached to Sevor Affidavit.

Litton Industries, Inc.

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LITTON INDUSTRIES, INC.
AND SUBSIDIARY COMPANIES

Revenues and Earnings by Quarter

(thousands of dollars, except per share data)	1975	1974
Sales and service revenues (2)		
Continuing operations		
First quarter	$ 833,562	$ 666,032
Second quarter	829,292	720,603
Third quarter	866,271	805,310
Fourth quarter	881,467	837,928
Total continuing operations	$3,432,592	$3,029,873
Discontinued operations		$ 52,105
Net earnings (loss) (1) (2) (3)		
Continuing operations		
First quarter	$ 8,351	$ 11,894
Second quarter	8,786	13,465
Third quarter	8,946	11,515
Fourth quarter	9,197	(51,589)
Total continuing operations	35,280	(14,715)
Discontinued operations		(14,451)
Disposal of segments		(10,640)
	$ 35,280	$ (39,806)
Earnings (loss) per share (2) (4) (5)		
Continuing operations		
First quarter	$ .20	$ .29
Second quarter	$ .22	$ .33
Third quarter	$ .22	$ .28
Fourth quarter	$ .23	$(1.55)
Total year continuing operations	$ .87	$ (.58)
Discontinued operations		(.41)
Disposal of segments		(.30)
	$ .87	$(1.29)

(1) In the third quarter of fiscal 1975, the Company sold all of the marine vessels which were previously chartered to an unaffiliated company. As a result, included in the third quarter net earnings is an amount of $4,326,000 related to this transaction, of which $1,957,000 pertains to the retirement of $6,071,000 of the Company's 3½% Convertible Subordinated Debentures, due April 1, 1987, received as part of the sales price consideration. In addition, in the third quarter the Company resolved a licensing issue, and a portion of the settlement in the amount of $1,292,000, after provision for taxes, is also included in the third quarter net earnings. The balance of the settlement is being deferred and amortized over the useful lives of the related patents.

(2) The 1974 first quarter, second quarter and third quarter revenues, net earnings (loss) and earnings (loss) per share have been restated to segregate amounts relating to operations divested in the fourth quarter of 1974.

(3) In July 1974, decisions were made relating to changes in Business Systems and Equipment Group products which resulted in a before-tax provision of $77,219,000. Income tax credits relating to this provision amounted to $16,300,000.

(4) In accordance with current accounting principles, the quarterly earnings (loss) per share amounts were computed using the weighted average number of shares outstanding for each quarter, and the annual earnings (loss) per share amounts were computed using the weighted average number of shares outstanding for the year. Because there were differences in the number of shares outstanding during the year, the quarterly amounts do not add to the annual amounts in 1974.

(5) Earnings (loss) per share amounts do not give effect to the 2½% common stock dividend payable November 15, 1975 to holders of record at the close of business September 18, 1975.

Exhibit A — Annual Report for the Fiscal Year Ended 7-31-75 attached to Sevor Affidavit.

Shareholders' Letter

To Our Shareholders:

The company's sales from continuing operations for fiscal 1975 increased by more than 13 percent, and net earnings totaled $35,280,000. In fiscal 1974, the company reported a loss of $39,806,000, which included after-tax charges of $23,091,000 related to discontinued operations. The 1974 results also reflected a provision for a $77,219,000 pre-tax reserve related primarily to the phasing out of electromechanical business equipment products and the restructuring and consolidation of Litton's worldwide typewriter operations.

Three of Litton's four major product groups, which account for 70 percent of the company's business volume, increased their combined operating profit by more than 26 percent.

The Industrial and Professional groups set records for both sales and profitability, reflecting the outstanding performances of the machine tool, electronic and electrical components, microwave oven, and seismic resource exploration operations. The Defense, Commercial and Marine Systems Group also improved its performance significantly, although a substantial part of the gain came from the sale of a fleet of commercial containerships. This group continues to expand the commercial application of its technologies.

The Business Systems and Equipment Group recorded a loss for the year. While all of the group's operations were under severe recessionary pressures, the office furniture, paper and printing segments maintained good profitability considering the existing business climate. Profit contributions from the calculator operations were substantially reduced by the economic downturn, and the typewriter, cash register and business minicomputer operations recorded a loss.

Litton took major steps during the year to restructure its business equipment operations. These measures included the closing of three typewriter-manufacturing plants outside the United States and the realignment of certain typewriter marketing activities. In addition, the company continued to phase out electromechanical business lines in response to changes in market demand, replacing them with fully electronic products. The sale of a cash register plant in Sweden was a result of this trend. All of these actions were achieved within the financial provisions established for them a year ago.

Early in fiscal 1976, the first ship in the U.S. Navy's DD-963 program was delivered and commissioned into ser-

three

Exhibit A — Annual Report for the Fiscal Year Ended 7-31-75 attached to Sevor Affidavit.

vice, beginning the addition of an advanced, multimission capability to the fleet. The ship has been labeled a "destroyerman's dream" by a senior Navy officer who participated in its sea trials last February. During the year, the target price on this program was reset in accordance with contract stipulations. The contract's ceiling price of $2,201 million represents the original ceiling set in 1970, plus a net increase of $62 million for changes in scope of work. This price does not include contract escalation provisions covering the impact of inflation.

The final price on the LHA (general purpose assault) ship program is now the only major unresolved contractual issue between the company and the Navy related to active programs. This matter continues to be a serious concern, and its solution is being vigorously pursued, both in direct negotiations with the Navy and through the judicial procedures of the Armed Services Board of Contract Appeals.

While the company's two submarine-related claims before the ASBCA remain unsettled, these cases have now been heard by that Board and decisions on these claims are expected during fiscal 1976.

Throughout the year, Litton continued to develop the products and services necessary to maintain a competitive position in world markets. The company's largest investments this past year were made in the resource exploration, radiological and electronic medical equipment, microwave oven, and electronic retail information system fields.

During fiscal 1975, the company's continuous efforts to increase its operating effectiveness enabled it to meet higher production requirements with a significantly reduced level of employment. At year-end, Litton employed 97,000 persons, a reduction of 9 percent from the total on July 31, 1974.

Litton faces the new year with determination and with confidence that the progress made in fiscal 1975 will continue.

Charles B. Thornton
Chairman of the Board of Directors

Fred W. O'Green
President

October 14, 1975

Exhibit A — Annual Report for the Fiscal Year Ended 7-31-75 attached to Sevor Affidavit.

Litton Industries, Inc. | Operations Review

Exhibit A — Annual Report for the Fiscal Year Enaed 7-31-75 attached to Sevor Affidavit.

Litton Industries, Inc.

Operations Review

BUSINESS SYSTEMS AND EQUIPMENT

	Year Ended July 31 1975	1974
Sales:	$1,039,661,000	$1,065,495,000
Operating Profit (Loss):	(4,848,000)	38,576,000

Product Market-Areas	Fiscal 1975 Sales	% Increase (Decrease) From Fiscal 1974
Business Machines and Retail Information Systems	$488 million	0.1 %
Typewriters and Office Copiers	284 million	(5.9)%
Specialty Paper Printing and Forms	135 million	4.8 %
Office Products, Furniture and Fixtures	143 million	(5.4)%
Intragroup Eliminations	(11 million)	—

Sales Down 2%

Group sales were down 2 percent for the year, reflecting primarily the impact of the economic recession.

Many Factors Reduce Profit Margins

The group's operating loss was due to several factors: Intense industrywide, recession-oriented price discounting eroded profit margins in several product lines; lower production levels contributed to higher unit manufacturing costs; inventory adjustments were made in anticipation of shorter product life cycles in the calculator field; and the process of restructuring and consolidating some manufacturing operations disrupted related production.

Business Machines and Retail Information Systems

Fiscal 1975 Sales: $488 million

Principal products:
- Office Calculators
- Programmable Calculators
- Scientific and Engineering Calculators
- Hand-held Calculators
- Business Minicomputers
- Electronic Point-of-Sale Systems
- Electromechanical Sales Registers
- Retail Tag-making Equipment and Supplies
- Retail Information Products

Operations Restructured For Greater Efficiency

Major steps were taken in fiscal 1975 to align this group of divisions with changing business and market requirements.

Exhibit A -- Annual Report for the Fiscal Year Ended 7-31-75 attached to Sevor Affidavit.

This restructuring is enabling Litton to achieve savings in manufacturing and marketing overhead and to combine its related engineering and software capabilities more effectively.

Litton ABS Integrated Into Sweda, Kimball

As part of the program, the operations of the former Litton ABS (Automated Business Systems) division were integrated into the Sweda International and Kimball Systems divisions in September 1974.

Demand for Electromechanical Cash Registers Declines

Worldwide business conditions reduced the demand for electromechanical cash registers even more rapidly than was anticipated. This trend has been evident as new sales register installations are increasingly being made with fully electronic point-of-sale (POS) retail information systems. As a result of these developments, Sweda sold its 129,000-square-foot cash register plant in Varberg, Sweden in May. In addition, discussions and studies relating to the impact of current market trends on employment at the other cash register plants in Sweden are being conducted to determine future policies.

New Electronic Register, 2 POS Systems Introduced

Sweda broadened its line of new products by introducing two second-generation POS systems and a stand-alone electronic sales register. One of the POS systems is designed for use in general merchandise stores, and the other was developed to serve a broad cross section of retailers in Europe and other international markets. The new stand-alone register is the first Sweda electronic product directed at the vast market made up of smaller retail businesses, and its early sales have exceeded expectations.

POS Installations Begin in Food Stores

Initial installations of Sweda's Superegister™ POS system for food stores were made in American and European supermarkets. These early installations include full-scale POS systems in which the sales register is linked to a "backroom" minicomputer. They have the capability of being expanded to accommodate scanner "reading" when a higher level of Universal Product Code (UPC) marking is achieved throughout the food industry.

Sweda Introduces Advanced POS Scanner

Early in fiscal 1976, Sweda formally introduced its new optical laser scanning system for reading the UPC, which now appears on about half of all food packaging. The proprietary system offers major advantages over competitive equipment, principally the capability to read UPC symbols from any direction or angle.

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Operations Review

Business Machine Sales Expand at Triumph-Adler

The Triumph-Adler division, an increasingly important supplier of business machines in Europe in recent years, continued to expand its sales of these products. This growth was paced by rapid customer acceptance of the division's new TA[3]-1000 business minicomputer and by sales increases in the calculator market.

New Monroe Calculator Can Be "Customized"

In March, Monroe introduced a new desktop, general business calculator line, which includes two models that virtually allow customers to design their machines for specific requirements. This is done through the addition of optional functions to the standard keyboards. These new machines have received a strong sales response despite the general softness of the calculator market.

Overseas Sales Shifting To Dealer Networks

The company also began shifting its distribution channels for certain business equipment lines in Europe and Australia from direct sales offices to dealer networks. This program will be completed in fiscal 1976.

Typewriters and Office Copiers

Fiscal 1975 Sales: $284 million

Principal products: Electric and Manual Typewriters
Computerized Word Processing Systems
Office Copiers

Unfavorable Economic Trends Impact Triumph-Adler

The company's Triumph-Adler division operated at a considerable disadvantage in world typewriter markets as a result of international economic developments. The division, based in West Germany and heavily dependent on export sales, was seriously impacted by rising costs and unfavorable foreign exchange rates. As a result, its sales volume did not meet expectations and its overall profit margins were reduced considerably.

Royal-Imperial Sales Fall In Portable Typewriter Market

Royal-Imperial also saw its sales fall below expectations, reflecting the decline of consumer demand in the U.S. portable typewriter market. Programs to stimulate greater sales of these machines at retail outlets have been implemented.

Significant Progress Made In Typewriter Realignment

Litton's announced program to restructure and consolidate its worldwide typewriter operations made significant progress during fiscal 1975. Two Imperial plants in England and one in The Netherlands were closed, and dealer sales organizations have replaced the division's direct selling efforts in Canada and the United Kingdom. The final costs of these realignments were within the estimated reserves established in fiscal 1974.

Exhibit A — Annual Report for the Fiscal Year Ended 7-31-75 attached to Sevor Affidavit.

FTC Permits Litton To Retain Triumph-Adler

After six years of legal proceedings, the matter of Litton's acquisition of Triumph-Adler in 1969 was finally resolved. The Federal Trade Commission reversed a 1973 decision and ruled that the company could retain its ownership of the division.

New Single-Element Typewriters Strengthen Product Line

Both Triumph-Adler and Royal-Imperial introduced advanced models of a single-element typewriter in fiscal 1975, giving the company a greatly improved competitive position in the industry. Royal also added a new plain paper office copier model designed for smaller businesses to its product line.

Specialty Paper, Printing and Forms

Fiscal 1975 Sales: $135 million

Principal products: Electrosensitive Recording and Reproduction Papers
Bagasse Papers
Alpha Paper for Decorative Lamination
Bank Checks and Business Forms
Commercial Printing
Heat Transfer Printing for Textiles

Paper Operations Match Last Year Despite Recession

Litton's Specialty Paper, Printing and Forms divisions matched last year's sales and profitability, even though basic paper operations were severely affected by the recession over the last half of fiscal 1975. This achievement was primarily indicative of high business levels earlier in the year and the adoption of effective cost control measures as volume declined.

Sales of Decotherm® Dye Process Double

Business in the specialty paper operations continued at a high level. Although sales of laminating materials to the building and furniture industries continued at a slow pace, the Decotone division was able to offset the reduced volume by more than doubling the sales of its Decotherm® heat transfer dye process for synthetic fabrics.

Decotherm® Capacity Being Expanded

During fiscal 1976, Decotone plans to increase substantially its capacity to provide Decotherm® materials, further enhancing its position in this rapidly growing market. Under the Decotherm® process, patterns are first printed on paper and then transferred to cloth by heat and pressure, providing greater flexibility and economy than conventional methods.

Exhibit A — Annual Report for the Fiscal Year Ended 7-31-75 attached to Sevor Affidavit.

Operations Review

Office Products, Furniture and Fixtures
Fiscal 1975 Sales: $143 million
Principal products: Office Furniture and Equipment
Office Planning and Design
Retail Store Design and Fixtures

Furniture and Fixtures Sales Reflect Market's Weakness

Office furniture and retail fixture sales were slightly lower than in fiscal 1974, reflecting the basic weakness of these markets during the year. Considering the recessionary economic climate, profitability was maintained at a satisfactory level as these divisions implemented tight cost controls early in fiscal 1975.

4 Labor Disputes Settled, Plants Back in Production

Work stoppages due to labor disputes occurred in four divisions, including a 16-week strike at Cole. As fiscal 1975 ended, all of these plants were back in operation.

Exhibit A — Annual Report for the Fiscal Year Ended 7-31-75 attached to Sevor Affidavit.

DEFENSE, COMMERCIAL AND MARINE SYSTEMS

	Year Ended July 31	
	1975	1974
Sales	$1,222,178,000	$896,311,000
Operating Profit	53,636,000	36,885,000

Product Market-Areas	Fiscal 1975 Sales	% Increase (Decrease) From Fiscal 1974
Navigation and Control Systems	$248 million	16.5%
Communications and Electronic Data Systems	215 million	11.2%
Marine Engineering and Production	765 million	54.7%
Intragroup Eliminations	(6 million)	—

High DD-963 Production Paces Group's Sales Gain

The Defense, Commercial and Marine Systems divisions increased their combined business volume of commercial and defense-related products by 36 percent. This gain was due primarily to a $270 million sales increase resulting from high production levels on the Navy's DD-963 destroyer program. Sales on the company's major shipbuilding contracts are booked on a percentage-of-completion basis. The gain also reflects a $56 million sales increase in the rest of the group, which enjoyed particularly strong growth in markets for commercial systems.

Sale of Containerships Boosts Operating Profit

Operating profit for the group was up by 45 percent, with the increase resulting mainly from the sale of a fleet of containerships which had previously been on lease. Profitability in the defense electronics operations was at the same level as in fiscal 1974. The LHA (general purpose assault) ship program is being recorded on a break-even basis.

Navigation and Control Systems

Fiscal 1975 Sales: $248 million

Principal products: Aircraft Inertial Navigation Systems (INS)
Missile Inertial Guidance Systems
Marine Navigation Systems
Automated Ship Control Systems
Military Avionic Computers

High Achievement Recorded In INS Operations

Fiscal 1975 was a year of high achievement in Litton's inertial navigation systems (INS) operations. Worldwide demand for these highly sophisticated and efficient systems continued to grow in both the military and commercial fields. Inertial

Exhibit A — Annual Report for the Fiscal Year Ended 7-31-75 attached to Sevor Affidavit.

Operations Review

systems are being used today on land, sea and air vehicles in navigation, guidance, surveying, mapping and instrumentation applications.

15 New Airlines Buy Litton Inertial Systems

In the commercial INS area, Aero Products added 15 new airlines as customers for its inertial systems, bringing the total to 55. Sales were particularly strong outside the U.S., and new foreign customers included Malaysian Airlines, Trans-Mediterranean Airlines, Japan Airlines, Saudia, Royal Jordanian Airlines, Cathay Pacific and the Australian Department of Transportation. Airbus Industries' A300B and Lockheed's L1011 were added to the list of aircraft now operating with Litton INS. In addition, the division booked initial orders for its ground proximity warning systems for passenger aircraft and began deliveries of approximately 500 units.

Commercial INS Being Used In Offshore Energy Search

Continuing the expansion of INS technology to commercial fields, Aero Products introduced a system for the maritime market. It provides accurate navigation and positioning for vessels engaged in exploration for gas and oil.

Inertial Unit Is Heart Of Airport Safety System

Helping to maintain airport safety at the highest standards, Litton Systems (Canada) began supplying the Canadian Ministry of Transport with a specially modified inertial system that serves as the heart of the agency's new airborne, automatic Flight Facilities Inspection System. The system is used to inspect airport instrument landing systems and navigation aids. It permits these tests to be made from the air, in less time, at lower cost and without curtailment of normal airport operations.

Navy's CAINS Program In Full Production

Guidance and Control Systems reached full production on the U.S. Navy's CAINS (Carrier Aircraft Inertial Navigation Systems) program, for which it received another follow-on order during the year. CAINS is now operational on the Navy's F14, A6E, S3A and E2C aircraft. Additional orders also were received to supply INS for the U.S. Air Force's F15 fighter and for the F5E/F international fighter, and these production runs continued at high levels.

Many Programs Advance At Guidance and Control Systems

Other highlights at the division included: Delivery of the first missile guidance units for a competitive fly-off on the Navy's Strategic Cruise Missile development program; several highly successful flight tests which positioned the division as a second-source supplier for guidance units for the Trident I

submarine missile; an important U.S. Army contract for inertial systems for military surveying applications; and selection of the division's proven computer for defensive electronic countermeasure systems on the Air Force's B1 bomber.

First Sales of Survey Systems Made to Commercial Customers

In addition, Guidance and Control booked the first sales of its land vehicle-mounted commercial inertial surveying system with U.S., Canadian and South American customers. The system is capable of surveying large land areas in a greatly reduced time span with a very high degree of accuracy. Its major applications are expected to be in land management and resource exploration programs, particularly in the developing countries.

Litton-built Systems to Look For Signs of Life on Mars

Guidance and Control also delivered two Gas Chromatograph Mass Spectrometers to NASA that are key subsystems on the Viking space probes launched last summer. The 43-pound systems, developed under a $30 million contract, will analyze the composition of soil on the planet Mars, break down the makeup of the Martian surface atmosphere and help deduce how the organic compounds found there were formed. Their data will provide additional information regarding the possible existence of life on the "Red Planet."

Computer Hardware For MRCA Delivered

In Europe, LITEF began delivery of flight-qualified hardware for the main airborne computer and the interface units for the Multi-role Combat Aircraft (MRCA) being built by West Germany, Great Britain and Italy. This marks a major milestone in Europe's largest defense program, which is now in its test flight stage. The MRCA is expected to be in NATO service through the end of this century, and the current production potential of the program exceeds 1,100 aircraft.

Litton Italia Supporting NATO Defense Program

Litton Italia, based in Rome, also is contributing to the strength of NATO's defenses. The division is supplying the servo platforms and cockpit displays for the MRCA, INS for the F104 fighters of several NATO countries and terminal equipment for Hawk and Nike Hercules surface-to-air missile batteries.

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Operations Review

New Marine Navigation System Helps Boost Sales at C. Plath

C. Plath's strong sales growth in the marine navigation field was helped by the introduction of a new system which stresses the improved readability of displays, easy access to navigation and steering instruments, and the standardization of equipment size.

Communications and Electronic Data Systems

Fiscal 1975 Sales: $215 million

Principal products:
- Command and Control Systems
- Shipboard Electronics Systems
- Tactical Communications Systems
- Tactical Air Support Equipment
- Electronic Warfare Systems
- Radio Navigation Systems
- Computer Software and Data Processing Services
- Communications and Telecommunications Systems

Data Systems Starts Production On TACFIRE, TSQ-73 Programs

The Data Systems division began initial production in January on two major U.S. Army command and control systems. The Tactical Fire Direction System (TACFIRE), which had been through seven years of extensive research, development, design and field testing, represents the first use of computers in the field to increase the effectiveness of artillery fire. The AN/TSQ-73 "Missile Minder," a microminiaturized air defense system that had been under development and testing since 1970, succeeds an earlier generation of equipment in the coordination of multiple ground-to-air missile batteries.

First TRI-TAC Equipment Delivered for Testing

In the tactical communications field, Data Systems delivered for Army testing the first data processing equipment built for the Tri-service Tactical (TRI-TAC) Communications System. TRI-TAC is being designed to handle Army, Marine Corps and Air Force messages on a priority basis, to select the most efficient means of transmitting them and to carry out the actual transmission.

Data Systems also is supplying the Air Force with a TRI-TAC data adapter which will connect that service's existing communications equipment with the TRI-TAC system, and the Datalog division is developing digital facsimile terminals

Exhibit A — Annual Report for the Fiscal Year Ended 7-31-75 attached to Sevor Affidavit.

for TRI-TAC which are capable of providing quality reproduction of transmitted data in a very difficult communications environment.

Development Programs Launched In Communications, Displays

Other new programs at Data Systems included the start of design work for the Navy's Automated Communications Control System (ACCS), which will be a key element in the development of a vastly improved telecommunications system for directing operational forces, and the start of design and development work on a new flat panel display based on light-emitting diode (LED) technology which will visually present computer-generated information.

Advanced Communications Installed at Texas Airport

Amecom completed the installation of its advanced Terminal Communications Switching System (TCSS) for air traffic control at the new Dallas/Fort Worth Airport in May, and tower operations began the following month. TCSS equipment provides the facility with a degree of reliability and flexibility not previously available in conventional telephone switching systems.

Navigation Satellites to Use Mellonics' Computer Software

Mellonics made important progress in its NAVSTAR Global Positioning System (GPS) program activities. The division has responsibility for the design, implementation and testing of the computer software which will transmit navigational data from a master ground station to GPS satellites in orbit around the earth. When fully operational in the next decade, GPS will consist of 24 satellites providing precise navigational information to military forces on the ground, at sea or in the air.

Marine Engineering and Production

Fiscal 1975 Sales	$765 million
Principal activities	Naval Surface Ships
	Nuclear-powered Submarines
	Containerships and Bulk Cargo Ships
	Marine Design and Engineering

Target Price Reset For DD-963 Program

Reset negotiations with the Navy established a firm target price of $2.118 million on the 30-ship DD-963 contract just after year-end. As of July 31, the company estimated that DD-963 contract revenues over the life of the program would amount to $2,853 million, including realized and anticipated escalation payments made to cover the impact of inflation. The contract's ultimate profitability will be determined by a number of variables which cannot be accurately assessed at this time, including the collection of incentive awards related

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Operations Review

to the ships' technical performance, the rate of inflation in the national economy and Ingalls' production performance over the remainder of the program.

Ingalls Quantifies LHA Claim With ASBCA at $505 Million

In April, the company filed a quantification of its pending claim before the Armed Services Board of Contract Appeals (ASBCA) on the LHA (general purpose assault) ship contract price. This quantification, amounting to approximately $505 million, included the effects of the much-higher-than-expected inflation rate experienced over the last three years, projected future inflation and other costs resulting from Navy-caused design changes, delays and program disruptions.

Navy's Unilateral Pricing On LHAs Still in Effect

The LHA contract's current funding, which is based on the unilateral decision of a Navy contracting officer in 1973, is $967 million. The company's appeal of this decision is the subject of its claim before the ASBCA.

Decision on Submarine Claims Expected Early in Fiscal 1976

A decision on Ingalls' multi-million-dollar SSN688 submarine contract claim—one of the division's two submarine-related claims before the ASBCA—is expected early in fiscal 1976. The hearings were completed in March 1974.

Justice Department Investigates Misrepresentation Charge

In January 1974, the Navy referred to the Justice Department for investigation an assertion by an individual Navy officer that Ingalls' submission on this claim contained misrepresentations. This investigation is proceeding before a Grand Jury in Alexandria, Va. The action of the Navy, as explained in the letter of referral and in Congressional testimony, was not to support the charge but only to ask that it be investigated. The Navy did not present any allegations or indications of misrepresentation at the SSN688 trial before the ASBCA. The company believes that the SSN688 claim was not misrepresented.

Ingalls Delivers USS SPRUANCE, First DD-963-Class Destroyer

Shortly after fiscal year-end, on Aug. 12, the first advanced destroyer in the DD-963 series, the USS SPRUANCE, was delivered to the Navy at Ingalls' Pascagoula, Miss., shipyard. The delivery was made within nine months of the original contract date set five years ago, which did not make provision for delays resulting from labor disputes, storms and accidents.

USS SPRUANCE Claims Many "Firsts" for a U.S. Warship

The USS SPRUANCE displaces 7,800 tons, making it nearly twice as large as the previous class of destroyers built for the fleet. The vessel is a highly sophisticated anti-submarine warfare platform with multimission capabilities

Exhibit A — Annual Report for the Fiscal Year Ended 7-31-75 attached to Sevor Affidavit.

which lays claim to many "firsts" for a major U.S. warship, including The use of gas turbines for main propulsion and for electric generators; all-digital fire control systems, and contractor-developed computer software for its electronic systems. The USS SPRUANCE also is the most silent running surface ship in the Navy fleet today.

DD-964, TARAWA Complete Successful Builder's Trials

The second destroyer in the DD-963 series, the FOSTER, and the lead vessel in the LHA program, the TARAWA, successfully completed initial builder's trials in the Gulf of Mexico in August. The TARAWA met its primary performance requirements, such as range, speed and maneuverability.

All 35 Ships in Major Navy Programs In Various Stages of Production

As of Sept. 30, 1975, nine destroyers had been launched and were being outfitted; the 10th through the 16th had had their keels laid and were in construction; and the remaining 11 ships in the series were in earlier phases of production. As of the same date, two LHAs had been launched and the other three were in various stages of production.

Sea Trials Prove Value Of Land-based Test Facility

The successful sea trials of the new destroyers and the LHA reflect the value of Ingalls' Land-based Test Facility, where the vessels' electronics are assembled and pre-tested in the same systems configuration as they will have aboard the ships.

Ingalls Demonstrating Advantages Of Modular Shipbuilding Techniques

The advantages of both modular construction techniques and serial production are now being demonstrated at Ingalls' shipyard. The division also has recently enjoyed considerable success in hiring skilled workers as a result of the continuing impact of the recession on the construction industry in the South. In a seven week recruiting period near year-end, Ingalls netted some 2,600 new employees, most of whom had some experience in vital shipbuilding skills.

Division Looking To New Programs

Looking past the completion of its major Navy programs, Ingalls at year end was preparing a bid for the construction of additional Navy ships. The division also is considering the construction of combat ships for several foreign navies, as well as a number of commercial construction opportunities

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Operations Review

INDUSTRIAL SYSTEMS AND EQUIPMENT

	Year Ended July 1975	19
Sales:	$667,609,000	$649,(
Operating Profit:	68,030,000	53

Product Market-Areas	Fiscal 1975 Sales	% Increas From Fi
Machine Tool Systems	$263 million	6.8 %
Material Handling	92 million	(5.4)%
Electronic and Electrical Components	314 million	2.1 %
Intragroup Eliminations	(1 million)	—

Sales Increase 3%

Sales for the Industrial Systems and Equipment G. were up 3 percent. Exceptionally strong backlog levels in the year helped to offset generally declining order ra capital equipment as the recessionary trend deepened

Group Improves Operating Profit

Operating profit increased by 27 percent. The improvement was due to the application of stringent cost-cutti measures in a as of declining volume, near-capacity u many facilities fo. much of the year, and continued elim tion of products with low profit margins.

Machine Tool Systems

Fiscal 1975 Sales: $263 million

Principal products: Cylindrical Grinding Machines
Disc and Surface Grinding Machine
Abrasive Discs
Automatic Bar and Chucking Mach
Boring, Milling and Drilling Mach
Thread-rolling Machines
Drills, Taps, Dies and Cutting Tools
Hand Tools
Specialty Metal Products

Record Shipments Reduce Machine Tool Backlogs

Shipments by Litton's machine tool divisions reached t highest level in the company's history as these operation worked from record backlogs built up in fiscal 1974. At y end, the company's machine tool backlog was still at 70 p cent of last year's peak level, even after the heavy shippin rates and reduced levels of incoming orders. Backlogs re satisfactory in the grinding machine and metal product tions, but the unfilled order level in the metal-cutting machine divisions has been heavily impacted by general economic conditions.

Exhibit A — Annual Report for the Fiscal Year Ended 7-31-75 attached to Sevor Affidavit.

Landis Grinder Attracts International Attention

Despite the uncertain business climate, there are indications that many potential buyers are recognizing the need to increase their production efficiencies through capital spending in the near future. For example, international interest has been aroused by an automated Landis Tool grinding system following highly favorable reports on how it has produced major gains in productivity and quality for a major U.S. auto company.

New Britain Machine Accelerates New Market Development

In the metal-cutting machine operations, New Britain Machine accelerated the development of new markets for an expanding line of numerically controlled equipment. The division also concentrated on broadening its other product lines. This program was illustrated by the delivery of three of New Britain's new friction welding machines for use in the construction of a 390-mile section of the Alaska oil pipeline. Now beginning to catch on in the United States, this technology is ideal for many other applications since it is four times faster than conventional welding.

Metal Product Sales Hold Up in Recession

Sales of metal products, which accounted for more than one-fourth of Litton's fiscal 1975 machine tool sales, held up well. Both the Merriman division, a leading supplier of self-lubricating construction bearings, and Contromatics, a producer of high-performance valves, set new business records. Merriman delivered over 50 percent of the massive construction bearings it is supplying for the Thames River Flood Control Barrier in London.

3 Machine Tool Divisions Expand Productive Facilities

Expansive moves in the machine tool divisions included the start of construction at Gardner Machine to increase its abrasives manufacturing capacity by 50 percent; a move by Contromatics to new facilities that double its production capabilities; and a plant expansion at Landis Lund in Great Britain.

This latter division had an upturn in its new order rate, with new bookings exceeding its fiscal 1973 sales despite the severe downturn in the European machine tool industry.

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Operations Review

Material Handling
Fiscal 1975 Sales: $92 million
Principal products: Bulk Material Handling Systems
Portable and Stationary Crushing Plants
Unit Handling Conveyor Systems

Hewitt-Robins Restructured

The organizational restructuring program in the company's Hewitt-Robins operations was completed.

Specialization Improves Margins In Material Handling Area

Both the bulk material handling and unit handling operations followed the same basic strategy in improving their profit margins—specializing in product lines and markets where they have competitive advantages.

Hewitt-Robins Expands In Energy Field

Hewitt-Robins, long a major supplier of bulk material handling systems to the coal mining industry, further expanded its activities in the energy field. The division began work on multi-million-dollar coal handling systems for power plants near Center, N.D., and Colstrip, Mont.

Buffalo Post Office Installs Litton UHS Conveyors

Following the successful installation of its automated mail handling systems at the U.S. Postal Bulk Centers for Chicago, Akron, Ohio, and Charleston, W. Va., Litton UHS (Unit Handling Systems) is supplying conveyors that will improve efficiency at the Buffalo, N.Y., Post Office.

Electronic and Electrical Components
Fiscal 1975 Sales: $314 million
Principal products: Computer Components and Subassemblies
Microwave Devices and Laser Materials
Servo Components
Consumer Electronics Components
Industrial Electric Motors
Electrical Lighting Components

Servo Components, Industrial Motors Turn in Strong Performances

The improvement in Litton's sales of electronic and electrical components was attributable to particularly strong performances in the servo components and Louis Allis industrial motor operations. Heavy demand for private and business aircraft cockpit instrumentation sustained servo component sales for most of fiscal 1975. A major part of Louis Allis's growth resulted from sales of large, special-application motors to public utilities and to the mining industry.

Computer, Magnetic Markets Softened by Recession

The computer and magnetic component operations saw considerable softening in their markets, and their sales were below fiscal 1974's levels.

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Advanced Technology Applied To Circuit Board Production

The Advanced Circuitry division maintained its position as the leading supplier of printed circuit boards (PCBs) to computer, peripheral equipment, calculation product, communication system and automotive manufacturers. The division also added new dimensions to its production capabilities by installing new equipment that allows it to produce the largest PCBs in the industry and to turn out PCBs by using the most advanced technology for adding copper to laminates. This process is more efficient than the standard etching method, resulting in significant cost savings. It also enables the division to pursue important opportunities in new markets.

Microwave Oven Component Sales Continue To Grow Rapidly

In the magnetics area, expanded sales of microwave cooking tubes and power packs to the Litton Microwave Cooking Products division and other companies represented the brightest achievement as the market for electronic ovens continued to grow rapidly.

Light Intensification Research Opens Up New Opportunities

The Electron Tube division's research and development work in light intensification technology resulted in an initial production contract from the U.S. Army for night vision goggles early in fiscal 1976. These devices are designed to provide a night-time operational capability—such as vehicle operation—without the need for auxiliary illumination, and further application of this new technology is expected to open up many new commercial markets for the division.

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PROFESSIONAL SERVICES AND EQUIPMENT

	Year Ended July 31	
	1975	1974
Sales:	$525,623,000	$443,305,000
Operating Profit:	43,516,000	40,107,000

Product Market-Areas	Fiscal 1975 Sales	% Increase (Decrease) From Fiscal 1974
Medical and Electronic Products	$287 million	17.9 %
Educational and Professional Publishing	62 million	(4.5)%
Resource Exploration	177 million	30.8 %

Sales Up 19%

Sales for the group increased by 19 percent. This advance was paced by major gains in the electronic medical systems, microwave oven and resource operations.

Operating Profit Improves 8%

Operating profit showed a gain of 8 percent. Major costs incurred to enhance the capabilities of the radiological equipment and airborne resource exploration operations tempered the rate of improvement.

Medical and Electronic Products

Fiscal 1975 Sales: $287 million

Principal products:
- Diagnostic X-ray Equipment
- Electronic Diagnostic and Patient-monitoring Equipment
- Dental Equipment
- Biomedical Services and Life Sciences Research
- Microwave Cooking Products
- Sound Projection and Recording Equipment

Microwave Oven Division's Growth Outperforms Market as a Whole

The Litton Microwave Cooking Products division expanded its sales by more than one-third, outperforming the strong growth rate of this market as a whole and strengthening its reputation as the leading supplier of both consumer and commercial microwave ovens in the United States.

New Consumer Ranges Combine Microwaves, Conventional Energy

The division introduced eight new home microwave oven models in fiscal 1975, maintaining this momentum. For the first time, Litton customers can purchase ranges which combine microwave and conventional electric cooking in a single, standard-sized unit. This feature is available in a line of Micromatic® ranges brought out last July. Many foods cook better when microwave and conventional energy are used in combination, permitting more flexibility in the preparation of meals and cutting normal cooking time in half.

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Litton Microwave Cooking expanded its marketing organization for increased effectiveness outside the United States. A new subsidiary established in Japan complements Litton Microwave Cooking Products' sales operations in Canada, the United Kingdom and Continental Europe. Export sales are also being made to Australia, Mexico, South Africa and several Caribbean nations.

Litton Ovens to Be Sold In Japanese Market

In February, the division began construction of a major addition to its microwave oven-manufacturing facilities near Minneapolis, Minn., to enable it to meet the continuing growth of this market.

New Construction to Enlarge Microwave Production Facilities

In the medical products area, every division increased its sales over fiscal 1974, and their combined business volume was up 14 percent.

All Medical Products Divisions Achieve Higher Sales Volume

The Litton Medical Systems division's new x-ray equipment was successfully modified to meet stringent new government requirements, and the division has restructured its operations to gain greater manufacturing efficiencies.

Litton Medical Systems Completes Modification of X-ray Line

The Hellige division enjoyed a record year, expanding its sales by nearly 25 percent. Much of this gain was due to the rapid and widespread acceptance of the division's new generation of patient-monitoring systems in the European market.

Hellige Has Record Year

These systems consist of modular units which monitor heartbeat, blood pressure, temperature, breathing or other vital functions and which can be linked to a central computer that monitors as many as 12 patients at the same time. When information on a patient's condition is needed, it can be obtained at the touch of a button from a scope screen or digital display, or it can be recorded. In an emergency, the central monitor automatically switches to data presentation on the patient in distress.

New Patient-monitoring Units Link Vital Functions to Computer

Litton Bionetics, which has provided key support to the U.S. Government's cancer research program for the past three years, won another renewal of its contract with the National Cancer Institute to manage the Frederick (Md.) Cancer Research Center. The division has responsibility for work on 20 projects in six research areas—viral oncology, chemical carcinogenesis, immunobiology of cancer, animal breeding and breeding, the cancer treatment program, and the establishment of chemical, radiological, biological and industrial controls to safeguard the environment.

Bionetics Continues Management Of U.S. Cancer Research Program

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Operations Review

Educational and Professional Publishing

Fiscal 1975 Sales: $62 million

Principal products: School and College Textbooks
Vocational and Technical Textbooks and References
Medical, Professional, Trade and Technical Periodicals and Directories

Educational Publishing Operation Has Modest Sales Increase

The educational publishing operations recorded a modest sales increase as a result of higher business volume in college, professional, reference, trade and vocational books. Unit sales of its elementary and high school texts were off, reflecting the severe budgetary pressures affecting local educational agencies across the United States.

Recession Impacts Revenues In Medical Publications Area

In Litton's Medical Economics division, revenues were lower as pharmaceutical companies held down their spending for advertising space in medically oriented periodicals. In addition, the U.S. Food and Drug Administration temporarily held up the release of a large backlog of new drugs, thereby delaying the advertising programs scheduled to introduce these products. A substantial portion of the drug backlog is expected to be released for use by physicians during fiscal 1976.

New Magazine Guides Physicians On Drug Actions, Interactions

Medical Economics maintained its profitability at satisfactory levels through increased sales of its annual directories and compendiums. The division also introduced a new magazine entitled *Current Prescribing* which is edited to provide in-depth guidance for physicians in private practice on the actions and interactions of drugs.

Resource Exploration

Fiscal 1975 Sales: $177 million

Principal activities: Geophysical Seismic Surveys and Data Processing
Airborne Geophysical and Photometric Operations
Geophysical Survey Instruments

Western Geophysical Sets Record for Performance

The intensive worldwide search for new energy reserves throughout fiscal 1975 was reflected in the record-setting performance of the Western Geophysical division, which increased its sales by more than 35 percent. The division's survey crews were very active in the Gulf of Mexico, Alaska, the North Sea, the Middle East and North Africa.

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"Portable" Exploration Vessel Supplements Activities Off Alaska

During the year, Western Geophysical introduced numerous innovations to its operations. One example was the development of a modular 80-foot seismic exploration vessel which can quickly be taken apart and transported by large cargo aircraft to any part of the world for reassembly. Because ice in the Bering Sea did not break up sufficiently last summer to allow conventional vessels to reach the northern coast of Alaska, the portable ship represented a significant operating supplement to another Western vessel which had been "iced in" since the previous warm season. In addition, continued improvements in the division's analytical programming led to increased sales of data processing by its worldwide network of computer centers.

Sales of Seismic Instruments Continue Rapid Growth

The expansion of Digital Data Systems' sales of sophisticated seismic recording instruments—sold exclusively to Western Geophysical until two years ago—was indicative of this equipment's technological superiority. New customers were particularly interested in the MANPAQ® modular field recording system, which can be carried on the backs of a survey crew to obtain seismic recordings in areas accessible only by foot, and its PRE/SEIS™ advanced seismic data processing system, which employs a minicomputer capable of producing on-the-spot evaluations of seismic data in the field.

Aero Service Extends Capabilities

Aero Service, now allied more closely with Western Geophysical, adopted new data recording and processing techniques which will significantly improve the quality and efficiency of its airborne geophysical and photogrammetric mapping operations. In addition, several new aircraft were acquired to handle Aero's expanding geophysical, mapping and air support business around the world.

Extensive Natural Gas Search Underway in Appalachia

In September 1975, Aero Service began an extensive aerial search over parts of West Virginia, Kentucky, Ohio and Virginia for hidden pockets of natural gas. The project is the largest venture of its type ever launched in the United States and was made possible through the use of side-looking airborne radar (SLAR). The resulting data, which permits scientific analysis of faults and geological formations, is being offered to oil, natural gas and mining companies, utilities and government agencies.

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LITTON INDUSTRIES, INC.
AND SUBSIDIARY COMPANIES

Five-Year Summary of Operations

(dollar amounts expressed in thousands, except per share data)

	Year Ended July 31, 1975	1974	1973	1972	1971
SUMMARY OF OPERATIONS					
Sales and service revenues	$3,432,592	$3,029,873	$2,418,343	$2,217,879	$2,092,034
Costs and expenses:					
Cost of sales	2,650,319	2,272,856	1,746,938	1,679,945	1,504,766
Selling, general and administrative	568,184	534,330	473,151	418,931	396,726
Depreciation	76,202	69,737	67,168	63,925	62,419
Interest	70,240	68,640	47,399	41,865	43,246
Provision for product changes in the Business Systems and Equipment Group		77,219			
National taxes on income	32,367	21,806	37,590	2,554	34,277
	3,397,312	3,044,588	2,372,246	2,207,220	2,041,434
Earnings (loss)—continuing operations	35,280	(14,715)	46,097	10,659	50,600
Income (loss) from discontinued operations, net of tax		(14,451)	(4,512)	(12,953)	(597)
Gain (loss) on disposal of segments of business, net of tax		(10,640)	1,445	3,412	
Net earnings (loss)	35,280	(39,806)	43,030	1,118	50,003
Dividends on preferred stock	(5,952)	(5,952)	(6,042)	(6,070)	(6,068)
Net earnings (loss) applicable to common and preference shares and common stock equivalent shares	$ 29,328	$ (45,758)	$ 36,988	$ (4,952)	$ 43,935
Earnings (loss) per share					
Continuing operations	$ .87	$ (.58)	$ 1.08	$ .12	$ 1.19
Loss from discontinued operations		(.41)	(.12)	(.34)	(.02)
Gain (loss) on disposal of segments of business		(.30)	.04	.09	
Earnings (loss) per share	$ .87	$(1.29)	$ 1.00	$ (.13)	$ 1.17
OTHER DATA					
Shareholders' investment	$ 796,598	$ 768,007	$ 836,158	$ 809,117	$ 814,032
Capital expenditures	$ 104,049	$ 88,460	$ 78,253	$ 81,968	$ 85,032
Common stock dividends	2½%	2½%	2½%	2½%	2½%
Number of employees	97,000	106,500	105,400	113,600	115,900

The summary of operations has been restated to segregate or exclude amounts relating to operations divested in fiscal 1972, 1973 and 1974.

Earnings (loss) per share are based on the weighted average number of common and preference shares outstanding and are after provision for cash dividends on Series A and Series B preferred stock. The number of shares used in the computation of earnings per share are: 33,790,051; 35,433,150; 37,119,040; 37,409,382; and 37,421,924 in 1975 to 1971, respectively.

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Management's Discussion and Analysis of the Summary of Operations

Major steps were taken to realign the company's Business Systems and Equipment Group during fiscal 1975, including the closing of three typewriter-manufacturing facilities. In addition, the transition from electromechanical to electronic product lines, notably the change from cash registers to point-of-sale (POS) equipment, continued to accelerate, indicating that this process will be completed sooner than the three-to-four years originally anticipated.

The launching of eight destroyers and two general purpose assault ships over the past two fiscal years, along with the delivery and commissioning of the first destroyer in the DD-963 program in early fiscal 1976, represented dramatically the rapid production buildup on the company's major U.S. Navy shipbuilding programs.

The work force at Litton's shipyard had been increased to more than 22,500 employees, and the company is now benefiting from the application of its advanced shipbuilding techniques and other important innovations, such as the Land-based Test Facility which is used for checking out shipboard electronic systems.

The resolution of the LHA contract pricing and cash flow issues with the Navy and the return to profitability of the Business Systems and Equipment Group are the two major areas which continue to be the focal points of management efforts.

The company has carried out a successful program aimed at improving profitability in its other operations. The impact of this program has been reflected partially in the financial performance of the Industrial Systems and Equipment and the Professional Services and Equipment groups, both of which achieved record profitability this past year.

The company's higher revenues over the past two fiscal years primarily reflect sales increases in the shipbuilding operations of over 50 and 100 percent in fiscal 1975 and 1974, respectively. Substantial sales gains also were recorded in the Professional Services and Equipment Group in both years.

Exhibit A — Annual Report for the Fiscal Year Ended 7-31-75 attached to Sevor Affidavit.

The relationship of cost of sales to total sales in fiscal years 1975 and 1974 was affected by the greater shipbuilding revenues because only nominal profits have been recorded in those operations. In addition, inflationary price-cost pressures impacted both the cost of sales and the general and administrative expenses of virtually all of the company's operations.

Interest expense for fiscal 1974 increased 45 percent over the previous year. This increase was due principally to higher prime lending rates at U.S. banks. There was also a slight increase in interest expense in fiscal 1975 as a result of increases in the prime lending rates for part of the year.

Fiscal 1974 earnings reflected the provision established in that year to cover the cost of the product changes and the restructuring in the Business Systems and Equipment Group. The major portion of this provision related to non-domestic operations and was not tax allocated.

Earnings in fiscal 1975 were favorably affected by the sale of a fleet of commercial containerships and the settlement of a litigation issue involving a licensing agreement, and adversely affected by realized currency exchange losses and increases in pension expenses. The company's earnings also benefited from a 9 percent reduction in total employment.

Product Group Results – Continuing Operations

(thousands of dollars)	Year Ended July 31, 1975	1974	1973	1972	1971
Sales and Service Revenues by Product Group:					
Business systems and equipment	$1,039,661	$1,065,495	$ 936,148	$ 805,450	$ 719,770
% of total	30%	35%	38%	36%	34%
Defense, commercial and marine systems	1,222,178	896,311	583,843	669,776	662,915
% of total	36%	29%	24%	30%	31%
Industrial systems and equipment	667,609	649,084	558,125	448,156	439,440
% of total	19%	21%	23%	20%	21%
Professional services and equipment	525,623	443,305	364,371	326,770	293,603
% of total	15%	15%	15%	14%	14%
Subtotal	3,455,071	3,054,195	2,442,487	2,250,152	2,116,728
Intergroup eliminations	(22,479)	(24,322)	(24,144)	(32,273)	(24,694)
Total Sales and Service Revenues— Continuing Operations	$3,432,592	$3,029,873	$2,418,343	$2,217,879	$2,092,034
Operating Profit by Product Group:					
Business systems and equipment	$ (4,848)	$ 38,576	$ 55,936	$ 37,954	$ 49,996
% of total	(3%)	23%	38%	38%	33%
Defense, commercial and marine systems	53,636	36,885	33,558	26,831	52,150
% of total	33%	22%	22%	27%	35%
Industrial systems and equipment	68,030	53,694	37,013	11,251	18,744
% of total	43%	32%	25%	11%	13%
Professional services and equipment	43,516	40,107	22,672	23,208	28,574
% of total	27%	23%	15%	24%	19%
Total Operating Profit— Continuing Operations	160,334	169,262	149,179	99,244	149,464
Provision for product changes and consolidation of facilities in the Business Systems and Equipment Group in 1974 and in Business Systems and Equipment, Defense, Commercial and Marine and Industrial Systems and Equipment Groups in 1972		(77,219)		(25,800)	
Interest and other unallocated expenses	(92,687)	(84,952)	(65,482)	(60,231)	(64,587)
Income taxes	(32,367)	(21,806)	(37,590)	(2,554)	(34,277)
Net earnings (loss)— continuing operations	$ 35,280	$ (14,715)	$ 46,097	$ 10,659	$ 50,600

Exhibit A — Annual Report for the Fiscal Year Ended 7-31-75 attached to Sevor Affidavit.

Product Market-Area Review

BUSINESS SYSTEMS AND EQUIPMENT

Product Market-Area	World Markets in which Litton Competes (in millions)		Litton Sales (in thousands)	Estimated Litton Sales to Major Customer Groups	
Business Machines and Retail Information Systems	Electronic Calculators	$1,710	1975: $487,631	Retailers and Retail Services	51%
	Electronic Accounting Machines	1,400	1974: 487,426*	Financial Institutions, Government Agencies And Others	23%
	Sales Registers and Point-of-Sale Systems	1,050	1973: 456,514*	Manufacturers	18%
	Identification Tags, Labels and Cards	750		Accounting, Engineering and Other Services	8%
Typewriters and Office Copiers	Plain Paper Copiers	$2,800	1975: $284,385	Commercial Offices	52%
	Office Typewriters	1,100	1974: 302,344	Consumers	30%
	Electrofax Copiers	750	1973: 250,906	Schools	11%
	Text-Editing Word Processing Systems	500		Government Agencies	7%
	Portable Typewriters	400			
Specialty Paper, Printing and Forms	Specialty Printing	$4,900	1975: $134,627	Manufacturers	52%
	Specialty Paper	2,900	1974: 128,505	Retailers and Retail Services	24%
	Bank Checks, Stationery and Forms	1,700	1973: 103,668	Home and Office Builders	13%
				Banks	11%
Office Products, Furniture and Fixtures	Office Products	$4,800	1975: $143,396	Retailers and Retail Services	58%
	Retail Fixtures and Services	1,200	1974: 151,638	Financial Institutions	23%
	Office Furniture, Space Planning and Design	1,100	1973: 131,565	Manufacturers	7%
				Schools	7%
				Other	5%

DEFENSE, COMMERCIAL AND MARINE SYSTEMS

Product Market-Area	World Markets in which Litton Competes (in millions)		Litton Sales (in thousands)	Estimated Litton Sales to Major Customer Groups	
Navigation and Control Systems	Missile Guidance Systems	$ 300	1975: $248,034	Government Defense Agencies	70%
	Defense Aircraft Inertial Navigation	250	1974: 212,935	Commercial and Private Air Carriers	30%
	Commercial Aircraft Inertial Navigation	50	1973: 177,390		
Communications and Electronic Data Systems	Information Systems	$2,300	1975: $215,097	Government Defense Agencies	86%
	Computer Software	1,500	1974: 193,508	Other	14%
	Electronic Reconnaissance	900	1973: 187,141		
Marine Engineering and Production	Commercial (U.S.)	$3,400	1975: $764,894	U.S. Navy	98%
	U.S. Navy	3,200	1974: 494,563	Commercial Ship Operators	2%
			1973: 223,422		

*Restated to include the sales made by Triumph-Adler and Royal in this category. These sales previously had been reported with typewriters and office copiers.

Exhibit A – Annual Report for the Fiscal Year Ended 7-31-75 attached to Sevor Affidavit.

INDUSTRIAL SYSTEMS AND EQUIPMENT

Product Market-Area	World Markets in which Litton Competes (in millions)		Litton Sales (in thousands)	Estimated Litton Sales to Major Customer Groups	
Machine Tools	Machine Tools	$2,200	1975: $263,312	Manufacturers, Auto and Aircraft	36%
	Expendable Cutting Tools	990	1974: 246,545	Agricultural, Steel, Electronics	20%
	Other Tools	700	1973: 222,129	Metalworking Shops	16%
				Other	25%
Material Handling	Bulk Handling	$1,300	1975: $ 91,423	Manufacturers	41%
	Unit Handling	400	1974: 96,677	Wholesale and Retail Distributors	32%
			1973: 86,259	Engineering, Mining Industries	17%
				Other	10%
Electronic and Electrical Components	Computer Industry	$ 450	1975: $313,395	Manufacturers	60%
	Magnetics	400	1974: 306,880	Government Agencies	22%
	Electric Motors	400	1973: 250,875	Industrial Distributors	10%
	Microwave Components	330		Consumer Electronics	8%
	Servomechanisms	300			
	Precision Gearing	130			
	Variable Speed Drives	130			

PROFESSIONAL SERVICES AND EQUIPMENT

Product Market-Area	World Markets in which Litton Competes (in millions)		Litton Sales (in thousands)	Estimated Litton Sales to Major Customer Groups	
Medical and Electronic Products	Electronic Cooking Units	$1,000	1975: $286,594	Doctors, Hospitals	46%
	Radiological Equipment	905	1974: 243,112	Consumers	24%
	Dental Equipment	695	1973: 210,706	Dentists	17%
	Electronic Medical Equipment	455		Government Agencies	9%
	Other	340		Other	4%
Educational and Professional Publishing	Elementary/High Schools	$ 565	1975: $ 61,593	Professional	57%
	Colleges and Universities	405	1974: 64,488	Schools	43%
	Professional, Reference and General	210	1973: 58,608		
	Professional Journals	145			
Resource Exploration	Geophysical Research (includes magnetic, seismic and photo services)	$1,050	1975: $177,436 1974: 135,705 1973: 95,057	Oil Producers	91%
				Government Agencies	4%
				Cartographers	3%
				Mining Industries	2%

Sales have been restated to exclude amounts relating to operations divested in fiscal 1974.
Total sales of the 13 product groups include intragroup sales of $16,946,000, $10,131,000 and $11,693,000 in 1975, 1974 and 1973, respectively.
Data on world markets are based on 1974 data.

Exhibit A — Annual Report for the Fiscal Year Ended 7-[illegible]-75 attached to Sevor Affidavit.

Litton Industries, Inc.

Financial Statements

Touche Ross & Co.
3700 Wilshire Boulevard, Los Angeles, California

October 3, 1975

Board of Directors and Shareholders
Litton Industries, Inc.
Beverly Hills, California

We have examined the consolidated balance sheet of Litton Industries, Inc. and subsidiary companies as of July 31, 1975 and 1974, and the related statements of earnings, shareholders' investment and changes in financial position for the years then ended. Our examination was made in accordance with generally accepted auditing standards, and accordingly included such tests of the accounting records and such other auditing procedures as we considered necessary in the circumstances.

As discussed in Note I, the ultimate profitability of the LHA contract is dependent upon attainment of estimated final costs and recovery through litigation or negotiation of approximately $300 million in excess of the present contract price. Because of the complexities of this litigation, management and outside counsel report that the exact amount of recovery cannot be determined at the present time. In addition, included in receivables are other shipbuilding claims carried at $43 million which, in the opinion of management, will be recovered through litigation.

In our opinion, subject to successful resolution of the unsettled matters related to the LHA Program and recovery of recorded contract claims described in the preceding paragraph and in Note I, the aforementioned consolidated financial statements present fairly the financial position of Litton Industries, Inc. and subsidiary companies at July 31, 1975 and 1974, and the results of their operations and the changes in financial position for the years then ended, in conformity with generally accepted accounting principles applied on a consistent basis.

TOUCHE ROSS & CO.
Certified Public Accountants

Exhibit A — Annual Report for the Fiscal Year Ended 7-31-75 attached to Sevor Affidavit.

LITTON INDUSTRIES, INC.
AND SUBSIDIARY COMPANIES

Consolidated Statement of Earnings

	Year Ended July 31, 1975	1974
	(thousands of dollars)	
Sales and service revenues, including equity in earnings of unconsolidated finance subsidiaries	$3,432,592	$3,081,978
Less discontinued operations		52,105
Sales and service revenues — continuing operations	3,432 592	3,029,873
Costs and expenses — continuing operations:		
Cost of sales	2,650,319	2,272,856
Selling, general and administrative	568,184	534,330
Depreciation	76,202	69,737
Interest	70,240	68,640
Provision for product changes in the Business Systems and Equipment Group		77,219
National taxes on income	32,367	21,806
	3,397,312	3,044,588
Earnings (loss) — continuing operations	35,280	(14,715)
Discontinued operations:		
Loss from discontinued operations, less credit for national taxes on income of $12,445		(14,451)
Loss on disposal of segments of business (including provision of $3,203 for operating losses during phase-out period), less credit for national taxes on income of $7,482		(10,640)
Net earnings (loss)	$ 35,280	$ (39,806)
Earnings (loss) per share (after dividends on preferred stock of $5,952 in each year):		
Continuing operations	$ .87	$ (.58)
Discontinued operations:		
Loss from discontinued operations		(.41)
Loss on disposal of segments of business		(.30)
		(.71)
Earnings (loss) per share	$ .87	$(1.29)

Earnings (loss) per share amounts do not give effect to the 2½% Common stock dividend payable November 15, 1975 to holders of record at the close of business September 15, 1975.

See accompanying notes to financial statements.

Exhibit A — Annual Report for the Fiscal Year Ended 7-31-75 attached to Sevor Affidavit.

LITTON INDUSTRIES, INC.
AND SUBSIDIARY COMPANIES

Consolidated Balance Sheet

	July 31, 1975	1974
	(thousands of dollars)	
Assets		
Current Assets:		
Cash	$ 75,753	$ 70,844
Accounts receivable, less allowance for doubtful accounts of $28,097 and $22,425	781,913	778,240
Inventories, at lower of cost or market, less progress billings of $389,508 and $361,520	563,505	616,693
Prepaid expenses	40,170	19,410
Total Current Assets	1,461,341	1,485,187
Equity in Unconsolidated Finance Subsidiaries	32,044	52,302
Long-term Investments (at cost) and Other Long-term Assets (including $1,267 and $1,154 due from officers)	69,144	60,675
Property, Plant and Equipment—at cost:		
Land	21,647	21,122
Buildings	301,388	297,638
Machinery and equipment	598,943	541,037
	921,978	859,797
Less accumulated depreciation	(425,393)	(378,302)
Net Property, Plant and Equipment	496,585	481,495
Cost of Businesses Purchased over Corresponding Net Assets	110,078	108,905
Other Assets, including Patents	16,539	11,982
Total Assets	$2,185,731	$2,200,546

Exhibit A — Annual Report for the Fiscal Year Ended 7-31-75 attached to Sevor Affidavit.

	July 31, 1975	1974
	(thousands of dollars)	
Liabilities and Shareholders' Investment		
Current Liabilities:		
Notes payable to banks	$ 185,936	$ 181,651
Commercial paper		29,298
Accounts payable and accrued expenses	463,211	487,912
National taxes on income	14,913	6,504
Current portion of long-term liabilities and debentures	37,703	30,495
Total Current Liabilities	701,763	735,860
Long-term Liabilities	460,132	468,876
Future Principal Payments for Leased Facility	118,680	121,710
Deferred National Taxes on Income	16,530	22,285
Deferred Service Contract and Other Income	40,881	31,590
Convertible Subordinated Debentures and Other Subordinated Debt	51,147	52,218
Shareholders' Investment (see accompanying statement)	796,598	768,007
Total Liabilities and Shareholders' Investment	$2,185,731	$2,200,546

See accompanying notes to financial statements.

Exhibit A — Annual Report for the Fiscal Year Ended 7-31-75 attached to Sevor Affidavit.

LITTON INDUSTRIES, INC.
AND SUBSIDIARY COMPANIES

Consolidated Statement of Shareholders' Investment

For the Years Ended July 31, 1974 and July 31, 1975

Balance, July 31, 1973
Net earnings (loss)
Cash dividends on preferred stock:
Series A—$3 a share
Series B—$2 a share
Transfer among accounts to record the 2½% Common stock dividend in November 1973
Transfer among accounts to record the conversion of Preference stock
Purchase of treasury shares
Value ascribed to shares issued for businesses acquired
Excess of cost of treasury shares used for 2½% Common stock dividend over par value
Excess of cost of treasury shares used for conversion of Preference stock over par value
Balance, July 31, 1974
Net earnings
Cash dividends on preferred stock:
Series A—$3 a share
Series B—$2 a share
Transfer among accounts to record the 2½% Common stock dividend in November 1974
Transfer among accounts to record the conversion of Preference stock
Purchase of treasury shares
Value ascribed to shares issued for businesses acquired
Excess of cost of treasury shares used for conversion of Preference stock over par value
Other capital charges
Balance, July 31, 1975
Share Information:
Shares outstanding, July 31, 1973
Shares issued for 2½% Common stock dividend in November 1973
Shares exchanged for conversion of Preference stock
Purchase of treasury shares
Shares issued for businesses acquired
Shares outstanding, July 31, 1974
Shares issued for 2½% Common stock dividend in November 1974
Shares exchanged for conversion of Preference stock
Purchase of treasury shares
Shares issued for businesses acquired
Shares outstanding, July 31, 1975
Shares Authorized:
Voting preferred, convertible, cumulative, par value $5, issuable in series
Voting preference, convertible participating series, par value $2.50
Common, par value $1
Number of shareholders

Exhibit A — Annual Report for the Fiscal Year Ended 7-31-75 attached to Sevor Affidavit.

(dollar amounts expressed in thousands)

Total Share-holders' Investment	Capital Stock				Additional Paid-in Capital	Earnings Retained in the Business	Common Shares held in Treasury
	Preferred						
	Series A	Series B	Preference	Common			
$536,158	$ 516	$ 14,403	$ 5,207	$ 33,126	$436,271	$356,581	$ (9,946)
(39,806)						(39,806)	
(309)						(309)	
(5,643)						(5,643)	
					6,648	(7,476)	828
(22,393)			(496)	13	245		238
							(22,393)
				13	(13)		
					(6,568)		6,568
768,007	516	14,403	4,711	33,152	(1,634)		1,634
35,280					434,949	303,347	(23,071)
						35,280	
(309)							
5,643						(309)	
						(5,643)	
				829	4,024	(4,853)	
			(386)	172	208		6
(531)							(531)
55				35	20		
					(36)		36
(261)					(261)		
$596,598	$ 516	$ 14,403	$ 4,325	$ 34,188	$438,904	$327,822	$ (23,560)
	103,292	2,880,600	2,082,731	33,125,866			(1,116,300)
							828,477
			(198,197)	13,182			237,750
							(2,533,930)
				13,020			
	103,292	2,880,600	1,884,534	33,152,068			(2,584,003)
				829,109			(66,165)
			(154,678)	171,430			6,003
							(68,627)
				35,270			
	103,292	2,880,600	1,729,856	34,187,877			(2,712,792)
	22,000,000						
			8,000,000				
				120,000,000			
	2,895	8,956	20,782	128,073			

See accompanying notes to financial statements.

Exhibit A — Annual Report for the Fiscal Year Ended 7-31-75 attached to Sevor Affidavit.

**LITTON INDUSTRIES, INC.
AND SUBSIDIARY COMPANIES**

Consolidated Statement of Changes in Financial Position

	Year Ended July 31, 1975	1974
	(thousands of dollars)	
Working Capital was Provided by:		
Current operations:		
Earnings (loss) from continuing operations	$ 35,280	$(14,715)
Loss from discontinued operations		(14,451)
Loss on disposal of segments of business		(10,640)
Items not requiring (providing) working capital:		
Depreciation, principally straight-line (includes $3,071 for discontinued operations in 1974)	76,202	72,808
Deferred national taxes on income	(2,256)	1,239
Earnings of unconsolidated finance subsidiaries	(2,424)	(2,209)
Cost of businesses purchased over corresponding net assets		4,522
Disposition of and provision for write-off of property, plant and equipment		11,527
Working capital provided from operations	106,802	48,081
Decrease in advances to unconsolidated finance subsidiaries	22,682	
Incurrence of long-term liabilities and other subordinated debt	23,437	143,294
Increase in long-term liabilities and subordinated debt due to change in exchange rate	26,175	14,127
Increase in deferred service contract and other income	9,291	2,087
Other items		1,023
	188,387	208,612

(continued on page thirty-nine)

Exhibit A — Annual Report for the Fiscal Year Ended 7-31-75 attached to Sevor Affidavit.

	Year Ended July 31, 1975	1974
	(thousands of dollars)	
Working Capital was Applied to:		
Payments made or due within one year on long-term liabilities and debentures	$ 59,427	$ 46,821
Decrease in future principal payments for leased facility	3,030	2,895
Decrease in deferred national taxes on income	3,499	15,045
Additions to property, plant and equipment, less depreciated cost of disposals (1975 — $12,737 1974 — $12,621 — leased equipment	4,881	4,840
— other	86,411	70,799
Cash dividends on preferred stock	5,952	5,952
Purchase of treasury shares	531	22,393
Increase in long-term investments and other long-term assets, principally deferred currency realignment charges and future credits for national taxes on income	8,469	44,371
Other items	5,936	9,496
	178,136	222,612
Increase (decrease) in working capital	$ 10,251	$(14,000)
Changes in Working Capital:		
Increase (decrease) in current assets:		
Cash	$ 4,909	$(14,810)
Accounts receivable	3,673	118,559
Inventories, less progress billings	(53,188)	(64,207)
Prepaid expenses	20,760	2,988
	(23,846)	42,530
(Increase) decrease in current liabilities:		
Notes payable to banks	(4,285)	(9,464)
Commercial paper	29,295	(27,298)
Accounts payable and accrued expenses	24,701	(60,169)
National taxes on income	(8,409)	4,421
Current portion of long-term liabilities and debentures	(7,205)	35,980
	34,097	(56,530)
Increase (decrease) in working capital	$ 10,251	$(14,000)

See accompanying notes to financial statements.

Exhibit A — Annual Report for the Fiscal Year Ended 7-31-75 attached to Sevor Affidavit.

LITTON INDUSTRIES, INC.
AND SUBSIDIARY COMPANIES

Notes to Financial Statements

For the Years Ended July 31, 1975 and July 31, 1974

NOTE A—SUMMARY OF SIGNIFICANT ACCOUNTING POLICIES

Principles of Consolidation

The accounts of the Company and its wholly owned subsidiaries (other than its finance subsidiaries) are included in the accompanying financial statements. All material intercompany transactions are eliminated. Certain items in the 1974 financial statements have been reclassified to conform to the presentation contained in the 1975 statements.

The investments in finance subsidiaries are accounted for on the equity method and earnings of such subsidiaries are included in the consolidated statement of earnings.

Translation of Non-U.S. Currencies

Assets and liabilities of operations located outside the United States have been translated to U.S. dollars at year-end market rates, except that property, plant and equipment and the cost of businesses purchased over corresponding net assets have been translated at approximate rates prevailing when acquired.

Income and expense items have been translated at average rates during the year, except depreciation which has been translated on the same basis as the related assets.

Net unrealized gains and losses from translation of non-U.S. assets and liabilities are deferred. Realized exchange gains and losses on settlement of current accounts are included in current earnings.

Inventories and Long-term Contracts

Defense, Commercial and Marine Group inventories are stated at the lower of average cost or market. Other inventories are generally stated at the lower of cost (first-in, first-out method) or market.

All contract costs, including general and administrative expenses, are included in Marine inventories; all such costs except general and administrative expenses are included in other inventories. Title to certain inventories vests in the U.S. Government by reason of contract provisions related to progress payments.

Revenues on contracts other than long-term contracts are generally recognized as products are delivered based on estimates of ultimate contract price. Profits on these contracts are recognized on delivery using the average profit expected based on current estimates of final contract values and costs. Revenues and profits on long-term contracts are recognized under the percentage-of-completion method of accounting. Revenues and costs, as well as work in process, are included in the financial statements based on current estimates of final values.

Any anticipated losses on contracts (estimated final contract costs in excess of estimated final contract revenues) are charged to current operations as soon as they are determined.

Research and Development

Company-sponsored research and development expenditures are charged to expense as incurred.

Property, Plant and Equipment

Expenditures for maintenance and repairs are charged against earnings. Additions, major improvements and renewals are capitalized and depreciated.

Depreciation is provided generally on a straight-line basis over the estimated useful lives of the various classes of assets from the respective dates of acquisition.

Costs and the related allowances for depreciation of properties sold or otherwise retired are eliminated from the asset and depreciation accounts. Gains or losses on disposition are recorded at the time of disposition.

Cost of Businesses Purchased Over Corresponding Net Assets

All present amounts which relate to companies acquired prior to 1970 are believed to have continuing

Exhibit A — Annual Report for the Fiscal Year Ended 7-31-75 attached to Sevor Affidavit.

value to the Company and are not being amortized. Any future amounts relating to subsequent acquisitions will be amortized in accordance with the provisions of Accounting Principles Board Opinion 17.

Income Taxes

The Company provides taxes to reflect the effect of reporting income and expense at different times for financial accounting purposes and for income tax purposes. These timing differences relate principally to depreciation expense and long-term contract profits. United States investment tax credits are deferred and amortized over the useful lives of the related assets.

Pension Plans

The Company has pension plans for most of its employees. Employees are eligible for benefits at age 65. Pension expenses for domestic and Canadian plans are provided and funded based on the actuarially determined costs of the plans. Pension expenses for other plans are based on actuarial computations and are funded in accordance with the laws of the applicable countries.

Earnings Per Share

Earnings per share are based on the weighted average number of common and preference shares outstanding and are after provision for cash dividends on Series A and Series B preferred stock.

NOTE B—EQUITY IN UNCONSOLIDATED FINANCE SUBSIDIARIES

Undistributed earnings of wholly owned finance subsidiaries were $26,026,000 and $23,604,000 at July 31, 1975 and 1974, respectively. These subsidiaries had total assets of $155,144,000 and $165,561,000 and liabilities to banks and others of $126,100,000 and $113,259,000 at July 31, 1975 and 1974, respectively. For the years ended July 31, 1975 and 1974, the earnings of these subsidiaries were $2,424,000 and $2,209,000, respectively.

NOTE C—LONG-TERM LIABILITIES, NOTES PAYABLE AND CREDIT ARRANGEMENTS

Long-term liabilities at July 31, 1975 and 1974 consisted of the following:

	1975	1974
	(thousands of dollars)	
Notes payable to insurance companies:		
Due to 1984 with interest at 4⅗%	$ 42,000	$ 48,625
Due to 1993 with interest from 6% to 6¾%	7,213	8,450
Notes payable to banks:		
Due to 1979 with interest at ½% to ¾% above published bank borrowing rates	110,000	155,543
Due 1977 to 1980 with interest at 6⅛% to 6⅝% (payable in Swiss francs)	103,213	86,005
Due 1976 to 1982 with interest at 7⅛% to 8% (payable in Dutch guilders)	15,095	16,541
Due 1978 with interest at variable rates above published bank borrowing rates (payable in German marks)	23,437	
Bonds payable to 1984 with interest at 6¼% (payable in Swiss francs)	24,002	20,000
Notes due December 1, 1976 with interest at 8¾%	60,000	60,000
Miscellaneous debt due to 1994 with average interest at 6%	75,172	73,712
	$460,132	$468,876

Notes to Financial Statements

For the Years Ended July 31, 1975 and July 31, 1974

The long-term liabilities at July 31, 1975 mature as follows (thousands of dollars):

Year ended July 31, 1977	$145,248
Year ended July 31, 1978	45,144
Year ended July 31, 1979	94 918
Year ended July 31, 1980	60,894
Years subsequent to July 31, 1980	113,928

Debt stated in other than U.S. dollars has been translated at the rates of exchange in effect at the end of each fiscal year.

The Company has complied with its agreements to maintain specified working capital, assets-to-debt and debt-to-equity ratios.

The average interest rate on short-term notes payable to banks outstanding at July 31, 1975 was 7.9%. The maximum amount of short-term notes payable outstanding at any month-end in 1975 was $226,477,000 while the average amount outstanding was $195,675,000. The weighted average interest rate on short-term notes payable during 1975 was 10.2%. This percentage was determined by considering the time each obligation was outstanding and the interest rate in effect during that time.

At July 31, 1975, the Company had total unused credit commitments of approximately $165,000,000, the major portion of which was available for refinancing maturing debt.

In connection with certain of its borrowings and unused credit commitments, the Company maintains compensating balances under informal arrangements ranging from 15% to 20% of outstanding debt or 10% of unused credit commitments. These balances are not legally restricted and are available for use in current operations. At July 31, 1975, the compensating balance requirements were $35,100,000. The compensating balance requirements for each calendar year are calculated based on average month-end balances.

NOTE D—FUTURE PRINCIPAL PAYMENTS FOR LEASED FACILITY

The shipyard facilities being leased at Pascagoula, Miss., may be acquired by the Company under certain conditions. Annual payments of approximately $9,000,000 from December 1975 through 1997 will amortize the principal and provide for interest costs.

NOTE E—CONVERTIBLE SUBORDINATED DEBENTURES AND OTHER SUBORDINATED DEBT

At July 31, 1975, there were outstanding $21,147,000 of 3½% debentures due April 1, 1987.

The debentures are convertible into Common stock of the Company at $42.50 a share until April 1, 1982 and $45.00 a share thereafter. The sinking fund requirements on these debentures have been satisfied to April 1, 1986.

The debentures are subordinated to all existing debt and future debt of the Company, with limited exceptions. The Company has complied with the terms of the debentures.

Other subordinated debt of $30,000,000 (payable in Swiss francs) represents outstanding debt of a wholly owned European subsidiary of the Company and is due June 26, 1977 with interest at 6¾% through June 1976 and 7¾% thereafter.

NOTE F—SHAREHOLDERS' INVESTMENT

The Series A preferred stock receives a $3.00 annual dividend. Each share is convertible into two shares of Common stock and is redeemable at the option of the Company at $100.00 per share plus accrued dividends. In the event of liquidation, each Series A preferred share is entitled to receive $50.00 a share plus accrued dividends.

The Series B preferred stock receives a $2.00 annual dividend. Effective September 19, 1974, the Series B preferred stock was no longer convertible into Common stock. Each share of Series B preferred stock is redeemable at the option of the Company on or after

January 15, 1978 at $80.00 a share plus accrued dividends and, in the event of liquidation, is entitled to receive $25.00 a share plus accrued dividends.

Each share of Preference stock is currently convertible into 1.3153 shares of Common stock. If a cash dividend is paid on Common stock, each share of Preference stock is entitled to receive a cash dividend in an amount equal to the dividend per common share times the then applicable Preference stock conversion rate. Each share of Preference stock is redeemable at the option of the Company at any time after January 31, 1976 at prices ranging from $67.75 in 1976 to $100.95 in 1989 and thereafter. In the event of liquidation, each preference share is entitled to receive $25.00 a share plus accrued dividends.

At July 31, 1975, 2,481,564 common shares were reserved for the exchange of the Series A preferred and Preference stocks described above. In addition, 497,565 common shares were reserved for exchange of the convertible debentures described in Note E.

In December 1970, the shareholders of the Company approved a Qualified Stock Option Plan under which shares of Common stock were made available for sale to key employees under option contracts at prices not less than the market value on the date the option is granted. Options are cumulatively exercisable and expire five years after the date of grant.

During the year ended July 31, 1975, options were granted to purchase 201,000 shares at prices ranging from $3.19 to $6.50. Options for 136,577 shares were cancelled, and no options were exercised. At July 31, 1975, options to purchase 200,241 shares at prices ranging from $3.19 to $12.14 were outstanding, options to purchase 333 shares at prices ranging from $8.57 to $12.14 were exercisable and 79,329 shares were available for future option contracts.

Subsequent to July 31, 1975, the Board of Directors declared a Common stock dividend of 2½% payable November 15, 1975 to holders of record of such Common stock at the close of business September 18, 1975. This transaction has not been reflected in the financial statements.

Under the terms of the Company's borrowing agreements, consolidated earnings retained in the business of approximately $20,000,000 were available for cash dividends at July 31, 1975. Earnings retained in the business are not restricted by the excess of the liquidation preferences ($101,182,000) of the Preference and Preferred stocks over their par value.

NOTE G—NATIONAL TAXES ON INCOME

The provision for national taxes on income is comprised as follows:

	1975	1974
	(thousands of dollars)	
Currently payable	$20,049	$18,733
Tax effect of timing differences	11,965	1,202
Net deferred investment tax credits:		
Deferred	1,144	2,368
Amortized	(791)	(497)
	$32,367	$21,806

The provision includes only national taxes of the governments of the United States and other countries. The non-U.S. taxes are $11,473,000 and $10,800,000 for the years ended July 31, 1975 and 1974, respectively. Other income taxes, including state income taxes, are classified as selling, general and administrative expenses and amount to $5,657,000 and $4,759,000 for the years ended July 31, 1975 and 1974, respectively.

Exhibit A — Annual Report for the Fiscal Year Ended 7-31-75 attached to Sevor Affidavit.

Notes to Financial Statements

For the Years Ended July 31, 1975 and July 31, 1974

The sources of timing differences and the tax effects are as follows:

	1975	1974
	(thousands of dollars)	
Excess of accelerated over straight-line depreciation	$ 639	$ 4,377
Difference in long-term contract profits between percentage-of-completion basis used for financial reporting purposes and completed-contract basis used for tax purposes	8,184	15,886
Change in provision for inventories and receivables (1974 related primarily to establishment of provision for product changes)	245	(11,430)
Change in estimated expenses	(938)	(6,304)
Difference for tax purposes in basis of assets sold	6,730	
Difference in period of recognition of deferred income for tax and financial purposes	(6,511)	
Loss for tax purposes on disposal of plants provided for financial purposes in a prior period	2,616	
Other	1,000	(1,327)
	$11,965	$ 1,202

At July 31, 1975, the balance of deferred investment tax credits is $11,424,000.

It is not expected that the cash outlay for national taxes on income with respect to any of the succeeding three years will substantially exceed expense for national taxes on income for such year.

No U.S. income taxes have been provided on undistributed earnings of non-U.S. subsidiaries as the Company consistently reinvests substantially all these earnings in the growth of the business outside the United States. Undistributed earnings of non-U.S. subsidiaries included in consolidated retained earnings amounted to $163,000,000 and $156,300,000 at July 31, 1975 and 1974, respectively. If such earnings were distributed, U.S. income taxes would be substantially offset by available tax credits.

NOTE H—TRANSLATION OF NON-U.S. CURRENCIES

Net unrealized exchange losses totaled $11,517,000 in 1975 and $5,597,000 in 1974. A large portion of the 1974 loss was offset against net gains deferred in prior years. At July 31, 1975, cumulative net losses of $12,646,000 (net of estimated future credits for national taxes on income) have been deferred and classified as Long-term Investments and Other Long-term Assets. The amount deferred has been computed based on rates of exchange in effect at year-end and is not necessarily indicative of the amount which would be deferred at another date, inasmuch as most major exchange rates have fluctuated substantially since early 1973, when the related currencies were allowed to float against the United States dollar in world currency markets. The Financial Accounting Standards Board (FASB) has issued a Proposed Statement of Financial Accounting Standards relating to Accounting for the Translation of Foreign Currency Transactions and Foreign Currency Financial Statements. The proposal calls for the inclusion in current earnings of all gains or losses relating to foreign currencies which arise during the period because of rate changes. Since this standard is still in a proposal stage,

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the practice followed by the Company in prior years of deferring unrealized exchange gains and losses has not been changed. When the FASB issues a final standard on this subject, the methods of accounting for foreign currencies set forth therein will be adopted by the Company.

Unrecognized gains on unperformed forward exchange contracts at July 31, 1975 were not significant.

Net realized exchange losses amounted to $5,108,000 for 1975 and $766,000 for 1974 and are included in current earnings.

NOTE I—DEFENSE CONTRACTS

Approximately 34 percent and 29 percent of the sales and service revenues of the Company for the years ended July 31, 1975 and July 31, 1974, respectively, arose from U.S. Government contracts and subcontracts. Approximately 85 percent of these revenues for 1975 relate to fixed-price contracts.

At July 31, 1975 and July 31, 1974, the amount of major defense contract backlog of work to be completed was approximately $2,349,000,000 and $2,945,000,000, respectively. In the backlog amount for July 31, 1975, the largest portion, $1,975,000,000, relates to two major ship programs (LHA and DD). Of this amount, $1,365,000,000 has been funded by contract.

Major contracts for complex weapons systems are performed over extended periods of time and are subject to changes in scope of work and delivery schedules. Pricing negotiations on changes and settlement of claims often extend over prolonged periods of time.

The Company's shipbuilding activities operate under long-term design and production contracts which presently relate principally to the LHA and DD Government contracts. At July 31, 1975, the total estimated contract revenues at completion including estimated escalation were $4,366,000,000 of which $1,993,000,000 represents work to be performed between now and 1980.

Estimated costs at completion for the LHA and DD contracts include estimates of inflation and forecasted improvement in productivity. As a result, at any given time in performance of these contracts, the profitability depends on achieving the forecasted total costs and estimates of total revenues. The accompanying financial statements have been prepared on the basis of management's current estimates of final contract revenues and costs.

A repricing proposal for the LHA (general purpose assault) ship contract was submitted on March 31, 1972 in accordance with contractual requirements and agreements. In February 1973 the U.S. Navy Contracting Office made a unilateral decision setting the contract price at an amount which, with small subsequent adjustments, presently totals approximately $967 million, including some escalation, for the five LHA ships. In March 1973 an appeal from this unilateral decision was filed before the Armed Services Board of Contract Appeals, requesting additional compensation and delivery date extensions for the engineering design and production changes formally ordered by the Navy, constructive changes, delays and disruptions caused by actions and inactions of the Navy, and other substantial issues of contractual interpretation. In April 1975, pursuant to an order of the Board, the complaint was quantified to request an adjustment to the original contract ceiling price of approximately $505 million. The effect of any award from this appeal may be subject to the revenue-sharing formula of the original contract.

Exhibit A – Annual Report for the Fiscal Year Ended 7-31-75 attached to Sevor Affidavit.

Notes to Financial Statements

For the Years Ended July 31, 1975 and July 31, 1974

The amount set forth in the unilateral U.S. Navy decision is approximately $300 million less than the currently estimated total costs at completion for this contract, including the nonrecurring manufacturing process development costs applicable to this contract. This estimated difference is substantially more than that estimated at the end of fiscal year 1974 due to increases in estimates of required labor hours and rapid inflation.

While it is the Company's position that any equitable decision should result in full recovery of all costs on the LHA contract, the exact amount of recovery cannot be determined at the present time because of the complexities of the litigation issues and the uniqueness of the LHA appeal due to its being the first case involving the Navy's application to a shipbuilding contract of the "Total Package Procurement" method, which is now prohibited by Department of Defense Regulations. Because of the foregoing uncertainties related to contract costs and recovery from claims, no profits or losses have been recorded on this contract. Preparation for trial before the Armed Services Board of Contract Appeals continues, but, due to the complexity of the matter, commencement of the main trial is not anticipated before calendar 1977. In the interim, discussions have continued with the Navy for resolution by negotiation of some of the substantive issues involved in the appeal, as well as provisional or other interim payments to finance continuation of contract performance pending resolution of the issues involved in the appeal.

Total contract cost estimates used to determine ultimate profitability on the LHA and DD programs include approximately $128 million of nonrecurring manufacturing process development costs incurred for and necessary to successfully complete the existing contracts in the new ship facility. Of this amount, approximately $90 million relates to the DD contract. At present approximately $46 million of DD manufacturing process development costs remain in inventory, and $44 million have been charged to earnings. On the LHA contract, that portion of the sales accrual and the corresponding charge to cost of sales representing the amortization of manufacturing process development has been classified as unbilled receivables. As of July 31, 1975, the LHA manufacturing process development costs are recorded in receivables and inventories at amounts of $24 million and $14 million, respectively.

The Company has two other major shipbuilding claims against the U.S. Navy filed with the Armed Services Board of Contract Appeals. These claims relate to contracts completed in prior years. The claims on these matters amount to approximately $135 million of which approximately $43 million has been recorded in receivables. In the opinion of management, the ultimate recovery of these claims will be at least equal to their present recorded value.

As is common with Government contracts, the Company's defense contracts are unilaterally terminable by the Government at its convenience with compensation for work completed and costs incurred. Profits on the Company's U.S. Government contracts are subject to renegotiation under the Renegotiation Act of 1951, as amended. The Company has received clearance from the Renegotiation Board on profits realized on renegotiable business through July 31, 1970. No renegotiation refunds are anticipated for subsequent periods.

Exhibit A — Annual Report for the Fiscal Year Ended 7-31-75 attached to Sevor Affidavit.

NOTE J—ACCOUNTS RECEIVABLE AND INVENTORIES

Following are the details of accounts receivable and inventories at July 31, 1975 and 1974, including those related to long-term programs:

Accounts Receivable:

	1975	1974
	(thousands of dollars)	
U.S. Government long-term contracts and programs:		
Amounts billed	$ 34,006	$ 27,737
Recoverable costs and accrued profit on progress completed—not billed	20,582	32,993
Retentions—Marine contracts	146,173	134,010
Unrecovered costs subject to future litigation or negotiation—not billed	67,095	71,768
	267,858	266,508
Commercial customers—billed	514,055	511,732
	$781,913	$778,240

Of the retention balance at July 31, 1975, $19 million is expected to be collected in fiscal 1976, with the balance to be collected in subsequent years, as long term contract deliveries are made.

Inventories:

	1975	1974
	(thousands of dollars)	
Finished goods	$271,242	$276,715
Inventoried costs relating to long-term contracts and programs, net of amounts attributed to revenues recognized to date	204	445,100
Raw materials and work in process	313,567	256,398
	953,013	978,213
Deduct progress billings related to long-term contracts and programs	389,508	361,520
	$563,505	$616,693

The following tabulation shows the cost elements included in inventoried costs related to long-term contracts:

	1975	1974
	(thousands of dollars)	
Production costs of goods currently in process	$250,566	$307,304
Excess of production cost of delivered units over the expected average cost of all units expected to be produced	12,050	16,955
Unrecovered costs subject to future negotiation	4,135	2,296
General and administrative costs	32,953	37,945
Unamortized manufacturing process development costs	60,500	80,600
	$368,204	$445,100

Exhibit A — Annual Report for the Fiscal Year Ended 7-31-75 attached to Sevor Affidavit.

Notes to Financial Statements

For the Years Ended July 31, 1975 and July 31, 1974

Production costs of goods currently in process represent costs incurred less costs associated with sales recorded under the percentage-of-completion method of accounting on a labor-incurred basis.

Total general and administrative expenses incurred at the Company's Marine facility during the years ended July 31, 1975 and 1974 were $35,942,000 and $36,923,000, respectively. As stated in Note A, the Company includes general and administrative costs in Marine inventories.

Progress billings related to long-term contracts and programs represent the difference between amounts received for costs incurred and amounts accrued as sales in accordance with the Company's percentage-of-completion basis.

NOTE K—DISCONTINUED OPERATIONS

The loss on disposal of segments of business in 1974 represents provisions for estimated losses relating to the Company's decision to cease operations at its industrial rubber products division and shut down or restructure for sale in the next few years several other businesses, including part of its communications equipment business.

During the year ended July 31, 1975, costs and losses of $14,674,000, before tax effects and net of revenues, were charged against the provisions established in prior years. The remaining provisions of $14,588,000, before tax effects, at July 31, 1975 are considered reasonable and adequate for remaining costs and losses from discontinued operations.

The consolidated balance sheets at July 31, 1975 and 1974 include the following amounts related to operations for which the Company has made a decision to divest and/or cease operations:

	July 31, 1975	July 31, 1974
	(thousands of dollars)	
Current assets	$24,207	$[illegible]3,662
Property, plant and equipment	9,689	1[illegible],517
Total Assets	33,896	48,179
Current liabilities	12,894	24,089
Long-term liabilities	7,476	10,023
Total Liabilities	20,370	34,112
Total Net Assets	$13,526	$14,067

Proceeds received from the disposal of property, plant and equipment amount to $8,500,000 for the year ended July 31, 1975.

NOTE L—PROVISION FOR PRODUCT CHANGES IN THE BUSINESS SYSTEMS AND EQUIPMENT GROUP

At July 31, 1974, reserves totaling $68,300,000 remained from a provision of $77,219,000 made in fiscal 1974 for product changes in the Business Systems and Equipment Group. The provision reflected the estimated cost of the phase-out of electromechanical products and the restructuring of typewriter operations. During the year ended July 31, 1975, actions relating to these product changes were taken and the resultant charges to the reserves amounted to $43,150,000 leaving a balance of $25,[illegible]000 at July 31, 1975.

Exhibit A — Annual Report for the Fiscal Year Ended 7-31-75 attached to Sevor Affidavit.

NOTE M—LEASES

Rental expense charged to income from continuing operations amounted to $50,887,000 and $50,418,000 for the years ended July 31, 1975 and 1974, respectively. The minimum rental commitments under all noncancellable leases payable during each of the following periods are:

	Real Estate	Equipment and Other	Total
	(thousands of dollars)		
Year ended July 31			
1976	$15,217	$2,612	$17,829
1977	12,004	1,250	13,254
1978	9,568	959	10,827
1979	8,058	846	8,904
1980	6,807	722	7,529
Five years ended July 31			
1985	20,281	2,096	22,377
1990	8,287	—	8,287
1995	3,762	—	3,762
Thereafter	2,049	—	2,049

The total commitments for all noncancellable leases through their expiration term is $94,818,000.

Many leases contain renewal and purchase options, and under many leasing agreements the Company pays the maintenance, insurance, taxes and other expenses in addition to the above minimum annual rentals. The impact on the financial statements, assuming the capitalization of "financing leases," as defined by the Securities and Exchange Commission, would not be material. Subleases are not significant.

NOTE N—EARNINGS PER SHARE

Earnings per share are based on the weighted average number of Common and Preference shares outstanding (after giving effect to all 2½% Common stock dividends through November 1974 and the current conversion rate of the Preference stock) and the number of Common stock equivalent shares deemed to have a dilutive effect. The number of shares upon which the per share computations were based were 33,790,051 and 35,433,150 in 1975 and 1974, respectively. Earnings (loss) per share and fully diluted earnings (loss) per share are the same.

NOTE O—PENSION AND RETIREMENT PLANS

Charges to operations under the various pension and retirement plans aggregated $23,800,000 and $20,400,000 for the years ended July 31, 1975 and 1974, respectively. The actuarial liability for vested benefits of the domestic and Canadian plans exceeded the corresponding market value of assets by approximately $67,000,000 at June 30, 1975. This unfunded amount results primarily from the decline in market values of invested funds. Past service costs are not significant.

The Employee Retirement Income Security Act of 1974 does not become effective until January 1, 1976. The Company has decided, however, to give effect to a portion of the changes required to be made to comply with the Act in expense accruals for the year ended July 31, 1975. This decision is the principal reason for the increase in pension expense in 1975. It is expected that full compliance with the Act in 1976 will result in an additional 15% increase in expense for the year ending July 31, 1976.

Notes to Financial Statements

For the Years Ended July 31, 1975 and July 31, 1974

NOTE P—OPERATIONS OUTSIDE THE UNITED STATES

The Company's operations outside the United States, located principally in Canada and Western Europe, are represented by assets of $595,000,000 and $596,000,000, liabilities of $551,000,000 and $537,000,000, and investment and net intercompany advances of $44,000,000 and $59,000,000 at July 31, 1975 and 1974, respectively.

Sales and net earnings (loss) were $829,000,000 and $13,000,000 and $744,000,000 and ($40,000,000) for the years ended July 31, 1975 and 1974, respectively. The 1974 loss includes a provision for product changes in the Business Systems and Equipment Group of $52,177,000 after application of income tax credits of $9,450,000.

NOTE Q—SALE OF MARINE VESSELS

In fiscal 1975, the Company sold its fleet of containerships which were previously chartered to an unaffiliated company. As a result, included in the 1975 net earnings is an amount of $4,326,000 (after provision for taxes of $3,994,000), related to this transaction, of which $1,957,000 pertains to the retirement of $6,071,000 of the Company's 3½% Convertible Subordinated Debentures, due April 1, 1987, received as part of the sales price consideration.

NOTE R—SETTLEMENT OF LITIGATION

Included in the 1975 statement of earnings is an amount of $1,652,000 (after provision for taxes of $1,524,000) representing a portion of the settlement in the third quarter of fiscal 1975 of a licensing issue. The balance of the settlement is being deferred and amortized over the useful lives of the related patents.

Exhibit A — Annual Report for the Fiscal Year Ended 7-31-75 attached to Sevor Affidavit.

Litton Industries, Inc.

Other Information About the Company

Exhibit A — Annual Report for the Fiscal Year Ended 7-31-75 attached to Sevor Affidavit.

Other Information About the Company

A BRIEF CORPORATE PROFILE

Litton Industries ranks as one of the world's major industrial corporations. Since its founding as a small California-based electronics firm in 1953, the company has greatly expanded its technological and marketing capabilities through a program of internal growth and acquisitions. Today, the company is engaged around the world in a broad spectrum of research, development, manufacturing and other activities in fields that include: Business machines and retail information systems; typewriters and office copiers; specialty paper, printing and forms; office products, furniture and fixtures; navigation and control systems; communications and electronic data systems; marine engineering and production; machine tools; material handling; electronic and electrical components; medical and electronic products; educational and professional publishing; and resource exploration.

WORLDWIDE SALES AND MARKETING

In general, each Litton division has responsibility for developing and carrying out its own marketing program.

The company's worldwide sales are made through division home offices, 1,348 direct sales/service centers in the United States and 23 other countries, travelling manufacturers' representatives, and thousands of independent distributors, dealers and agents in virtually every country. A breakdown of Litton's direct sales/service centers by major group follows:

Product Group	Major Direct Sales/Service Centers
Business Systems and Equipment	950
Defense, Commercial and Marine Systems	49
Industrial Systems and Equipment	116
Professional Services and Equipment	233
Total	1,348

Approximately 24 percent of Litton's sales and revenues are derived from its activities outside the United States, primarily in Canada and Western Europe. The company believes that the risks associated with these activities are not materially greater than those related to its business in the United States.

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COMPETITIVE AND REGULATORY FACTORS

Litton competes with a large number of companies around the world in the sale of all its products and services. These competitors vary in size and strength, ranging from small firms offering a single product or service in a given locality to large and diversified multinational corporations.

The company's contracts for and with the U.S. Government may be terminated at the convenience of the government whenever it determines that such action is in the best interest of the country. Should such termination occur, Litton is entitled to receive payment for work completed and costs incurred. Virtually all of the company's U.S. Government contracts relate to operations in the Defense, Commercial and Marine Systems Group.

CAPITAL EXPENDITURES

The company's capital expenditures in fiscal 1975 totaled $104 million, of which $86.4 million was spent for additional and more-productive machinery and equipment, and for equipment for lease to customers. The balance was spent for acquiring land and buildings. A summary of capital investment by major group follows:

Product Group	Total Capital Expenditures	% of Company Total
Business Systems and Equipment	$28.5 million	27.4%
Defense, Commercial and Marine Systems	16.3 million	15.7%
Industrial Systems and Equipment	16.7 million	16.0%
Professional Services and Equipment	42.5 million	40.9%
Total	$104.0 million	100.0%

For fiscal 1976, capital spending is expected to be approximately the same as in fiscal 1975. It is estimated that depreciation expense for fiscal 1976 will be in excess of $80 million.

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Other Information About the Company

BUSINESS BACKLOG

The backlog of company orders believed to be firm at the end of fiscal 1975 and 1974 follows:

Business Area	1975	1974
	(thousands of dollars)	
Defense, Commercial and Marine Systems	$2,348,594	$2,947,514
Other Product Groups	538,251	571,914
Total	$2,886,845	$3,519,428

The Defense, Commercial and Marine Systems backlog indicated above for 1975 contains $1,975,000,000 for two major ship programs (LHA and DD-963). Of this amount, $1,368,000,000 has been funded and $607,000,000—representing unfunded target prices (including claims), escalation accruals and change orders—is to be funded.

The ships being constructed under these Navy contracts are scheduled for delivery through 1980. The backlogs related to these contracts are reduced on the percentage-of-completion basis, rather than by the actual delivery of the ships involved. Substantially all of the company's backlog not related to these two contracts is expected to be filled during fiscal 1976. It should also be noted that many of the company's operations do not work from backlogs.

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PATENTS

The company makes every effort to obtain patents on the important inventions that result from its many activities. This policy protects profit margins on proprietary products, Litton's competitiveness in the marketplace and its ability to generate licensing income.

At the end of fiscal 1975, the company held patent rights in the United States and approximately 35 other countries. The following table shows the number of patents that Litton has had in force at the end of each of the last five fiscal years:

Fiscal Year	Total Litton-held U.S. Patents
1971	2,279
1972	2,347
1973	2,351
1974	2,455
1975	2,370*

*Estimated total

The company on July 31, 1975 also had more than 870 U.S. trademark registrations, approximately 430 U.S. and foreign patent applications pending and more than 200 patent applications scheduled for filing. Additionally, Litton had a large number of copyrights which protected its interests, principally in the educational and professional publishing fields.

Litton's general business is not dependent on the exclusivity afforded by any single patent, its application or any patent license agreement, and the company would not be affected materially by the expiration of any rights it holds in these areas. While Litton rarely brings patent litigation, the company does occasionally file patent infringement suits in high technology areas when it encounters an adamant refusal to recognize its proprietary rights.

Exhibit A — Annual Report for the Fiscal Year Ended 7-31-75 attached to Sevor Affidavit.

Other Information About the Company

EMPLOYMENT

Litton employed approximately 97,000 people on a full-time basis on July 31, 1975, a reduction of nearly 9 percent from the total at the end of fiscal 1974. Summaries of the company's employment by major groups and by key geographical areas are presented below:

Employment by Major Group

Product Group	Number of Employees	% of Litton Total Employment
Business Systems and Equipment	34,700	35.8%
Defense, Commercial and Marine Systems	34,400	35.5%
Industrial Systems and Equipment	17,000	17.5%
Professional Services and Equipment	10,900	11.2%
Total	97,000	100.0%

Employment by Key Geographic Areas

Geographic Area	Number of Employees	% of Litton Total Employment
United States	69,400	71.5%
West Germany	12,700	13.1%
France	2,500	2.6%
Italy	2,100	2.2%
Sweden	1,800	1.9%
Great Britain	1,700	1.8%
The Netherlands	1,200	1.2%
Other European Countries	1,000	1.0%
Canada	3,000	3.1%
Africa, Asia and Australia	900	0.9%
Latin America	700	0.7%
Total	97,000	100.0%

RESEARCH AND DEVELOPMENT EXPENDITURES

Litton's research and development expenditures for fiscal year 1975 were $122,600,000, compared with $111,300,000 for the previous year. Of the 1975 total, approximately 44 percent was sponsored by the company.

Approximately 2,700 and 2,600 full-time professional employees were involved in these efforts at July 31, 1975 and 1974, respectively.

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REAL ESTATE PROPERTIES

Litton's principal plants, offices and commercial centers have a total floor area of 19.9 million square feet. Summaries of the major geographic locations and major product group usage of these facilities follow.

Geographic Area	Sq. Feet	% of Total
United States	13.9 million	69.9%
West Germany	2.9 million	14.6%
Canada	.9 million	4.5%
France	.6 million	3.0%
Sweden	.5 million	2.5%
The Netherlands	.4 million	2.0%
Italy	.3 million	1.5%
Great Britain	.2 million	1.0%
Switzerland	.2 million	1.0%
Product Group		
Business Systems and Equipment	8.6 million	43.8%
Defense, Commercial and Marine Systems	3.3 million	17.1%
Industrial Systems and Equipment	5.3 million	27.7%
Professional Services and Equipment	2.0 million	10.4%

The company's principal U.S. plants are located in 68 cities in 25 states. Of the total 12.5 million square feet in these facilities, 72.3 percent is located in eight states—California, Pennsylvania, Connecticut, Mississippi, Illinois, Massachusetts, New York and Ohio.

The above square footage figures do not reflect the company's branch sales offices or any plants which, when added to all other Litton plants in the same city, have a total floor area of less than 30,000 square feet.

Approximately 70.9 percent of Litton's principal plant, office and commercial floor area is owned by the company, and the balance is held under lease. The company's general policy in manufacturing operations is to purchase sites and/or facilities because these are usually established for a long period. Offices and warehouse requirements are most often established under lease arrangements.

Exhibit A — Annual Report for the Fiscal Year Ended 7-31-75 attached to Sevor Affidavit.

Other Information About the Company

SECURITIES INFORMATION

The classes of Litton securities listed below are traded principally on the New York Stock Exchange and the Pacific Stock Exchange. The Common stock also is listed for trading on certain exchanges in Continental Europe.

High and Low Market Prices for Litton's Capital Stock on the New York Stock Exchange

Title of Each Class of Security	Quarter Ended			
	October 31	January 31	April 30	July 31
Series A $3 Cumulative Convertible Preferred Stock, par value $5.00				
Fiscal 1975—high	$29½	$27	$27¼	$30⅞
—low	20¼	23	25	27
Fiscal 1974—high	37	35¼	36	34¼
—low	32	30	32⅝	29⅝
Series B $2 Cumulative Preferred Stock, par value $5.00				
Fiscal 1975—high	$18⅜	$15½	$16½	$17½
—low	12½	10	14	14⅞
Fiscal 1974—high	20¼	20⅝	19¾	18⅞
—low	18⅜	18	18½	17¾
Convertible Preference Stock Participating Series, par value $2.50				
Fiscal 1975—high	$ 8⅜	$ 7	$ 9⅛	$12
—low	4⅛	4⅛	5⅝	8⅛
Fiscal 1974—high	12½	12¾	12½	10¾
—low	9½	7½	10½	8
Common Stock, par value $1.00				
Fiscal 1975—high	$ 7	$ 5¾	$ 7⅜	$ 9¾
—low	3¼	2⅞	5⅝	6¼
Fiscal 1974—high	10⅛	9⅞	10	8⅜
—low	7½	6	8	6⅜

A 2½ percent stock dividend was paid on the Common stock on November 15, 1974 and on November 15, 1973. The market prices shown above for the Common stock have been adjusted for these dividends where appropriate.

Semi-annual cash dividends of $1.50 per share were paid on the Series A preferred stock and quarterly cash dividends of $.50 per share were paid on the Series B preferred stock in both fiscal 1975 and 1974.

Exhibit A — Annual Report for the Fiscal Year Ended 7-31-75 attached to Sevor Affidavit.

Major Divisions of Litton Industries, Inc.

BUSINESS SYSTEMS AND EQUIPMENT

Business Machines and Retail Information Systems
Kimball, Monroe, Sweda

Typewriters and Office Copiers
Imperial, Royal, Roytype, Triumph-Adler

Specialty Paper, Printing and Forms
Carlisle, Decotone, Decotone-Permaco, Fitchburg, Fitchburg Coated Products, Litton Financial Printing, Papeterie De Versoix, Sturgis Newport, Valentine

Office Products, Furniture and Fixtures
ATAL, Cole, Lehigh-Leopold, Office Products Centers, SLS Environetics, Standard Desk, Streater

DEFENSE, COMMERCIAL AND MARINE SYSTEMS

Navigation and Control Systems
Aero Products, Guidance and Control Systems, LITEF, Litton Italia, Litton Systems (Canada), C. Plath

Communications and Electronic Data Systems
Amecom, Data Systems, Datalog, Mellonics

Marine Engineering and Production
Ingalls Shipbuilding

INDUSTRIAL SYSTEMS AND EQUIPMENT

Machine Tools
Amtec, Butterfield, Contromatics, Eldorado, Gardner Machine, Hand Tools, Landis Gendron, Landis Lund, Landis Tool, Lucas Machine, Merriman, New Britain Machine, Plastics Machine, Reed, Union/Butterfield

Material Handling
Hewitt-Robins Bulk Handling, Litton UHS, Union Chain

Electronic and Electrical Components
Advanced Circuitry, Airtron, Clifton, Electron Tube, Jefferson Electric, Kester Solder, Liberty Wire, Litton Fastening Systems, Litton Memory Products, Litton Precision Products International, Louis Allis, Poly-Scientific, Potentiometer, Triad-Utrad, USECO, Veam, Winchester

PROFESSIONAL SERVICES AND EQUIPMENT

Medical and Electronic Products
Dental, Eureka, Hellige, Litton Bionetics, Litton Medical Systems, Litton Microwave Cooking Products, Mijnhardt, Westrex

Educational and Professional Publishing
Litton Educational Publishing, Medical Economics

Resource Exploration
Aero Service, Western Geophysical

Exhibit A — Annual Report for the Fiscal Year Ended 7-31-75 attached to Sevor Affidavit.

Litton Industries, Inc.



BOARD OF DIRECTORS

Charles B. Thornton
Chairman, Litton Industries, Inc.

Fred W. O'Green
President, Litton Industries, Inc.

Glen McDaniel
Chairman of the Executive Committee, Litton Industries, Inc.

Ransom M. Cook
Director and Member of the Executive Committee, Pacific Gas and Electric Company

M. A. Hollengreen
Consultant to the Machine Tool Systems Group, Litton Industries, Inc.

Don G. Mitchell
Corporate Management Adviser

Geo. T. Scharffenberger
Chairman, President and Chief Executive Officer, City Investing Company (International Company in Manufacturing, Housing and Financial Services)

Jayne B. Spain
Vice Chairman, U.S. Civil Service Commission

Joseph A. Thomas
Managing Director and Member of the Board, Lehman Brothers Incorporated (Investment Banking)

Norman H. Topping
Chancellor, University of Southern California

James O. Wright
Investments

OFFICERS

Charles B. Thornton, Chairman of the Board

Fred W. O'Green, President

Glen McDaniel, Chairman of the Executive Co

Executive Vice President
Joseph S. Imirie

Senior Vice Presidents
Joseph T. Casey
Burnell A. Gustafson
Arnold R. Kaufman
Crosby M. Kelly
James R. Mellor
Ludwig T. Smith
Gerd E. Weers

Vice Presidents
Charles S. Bridge
Robert I. Bruder
Joseph F. Caligiuri
Leonard Erb
Joseph F. Francini
John D. Freitag
Charles A. Gallagher
John Grado Jr.
Nathaniel S. Howe
Robert F. Kane
Robert H. Lentz
Philip J. Lynn
Ned J. Marandino
John H. Martin
David K. Mutchler
Justin S. Oppenheim
Alex B. Owen
Booth B. Strange

Vice President and Secretary
George [illegible] Fenimore

Controller
Wayne L. Grosve[illegible]

Treasurer
Charles H. Black

Exhibit A — Annual Report for the Fiscal Year Ended 7-31-75 attached to Sevor Affidavit.

Corporate Offices
360 North Crescent Drive
Beverly Hills, California 90210
(213) 273-7860

Transfer Agent
Litton Industries, Inc.
P.O. Box 5535
Beverly Hills, California 90210

Registrar
Wells Fargo Bank, N.A.
Corporate Agency Department
Box 30407, Terminal Annex
Los Angeles, California 90030

BEST COPY AVAILABLE

Exhibit B – Standard and Poors Register, 1976, Vol. 1; Moody's Industrial Manual, 1975, Vol. 2 and Directory of Corporate Affiliations, 1976 attached to Sevor Affidavit.

[illegible] & CO. (INC).
[illegible], Mass. 03103
Tel. 617-777-0730
*Pres & Gen Mgr—Arthur P. Thorahill, Jr.
*V P—[illegible] A. Hill
*V P—[illegible]—James B. Plate
*V P—[illegible]
*V P—[illegible] J. Centolino
*V P—Timothy C. Robinson
*V P—[illegible] A. D'Cicco
Employees: 450
*Also DIRECTORS—Other Directors Are:
Richard B. McKeough
Zackary P. Morfogen
PRODUCTS: Publishing books
S.I.C. 2731

LITTLE FALLS FOOTWEAR, INC.
17 Hough St., St. Johnsville, N. Y. 13452
Tel. 518-568-2020
*Chrm—Stacey Simpson
*Pres—John Simpson
*V P (Sales & Adv)—Jerry W. Kirk
*Secy & Treas—Frank P. Colonnese, Jr.
Asst Treas & Cr Mgr—John Kopek
Prod Mgr—Steve Slaboe
Purch Agt & Exmr—[illegible]
Sales: $3Mil Employees: 125
*Also DIRECTORS—Other Directors Are:
Thurston H. Billington Peter H. DeCamp
Norman Simpson
PRODUCTS: Leather & fabric slippers, casual shoes, soccer moccasins
S.I.C. 3142; 3149

LITTLE GEORGE PRESS, INC.
750 Pine St., Burlington, Vt. 05401
Tel. 802-658-3300
*Pres—George B. Little, Jr.
*V P, Treas & Sales Mgr—Joseph E. Corbett
Prod Mgr—Roland Poulin
Accts—Briggs Keyes Co., Burlington, Vt.
Sales: Over $1.40 Mil Employees: 51
*Also DIRECTORS—Other Directors Are:
Francis R. Pritch
PRODUCTS: Color lithography, printing, book printing, magazine printing
S.I.C. 2752, 2732; 2751

LITTLE GIANT CORP.
3510 N. Tulsa St., Oklahoma City, Okla. 73112
Tel. 405-947-2511
*Pres & Treas—M. G. McCool
*Exec V P—Orie Zablatnik
V P (Sales)—Vincent X. Smith
V P (Mfg)—Roger Wright
Purch Agt—Louis Cline
Prod Mgr—Roger Wright
Chief Engr—Lee Davis
Sales: $10Mil Employees: 300
*Also DIRECTORS—Other Directors Are:
James E. Work
PRODUCTS: Small submersible pumps, sump pumps, chemical pumps, machine tool coolant, cooler pumps, outdoor 12-volt decorative lights
S.I.C. 3561; 3648

LITTLE GIANT PRODUCTS, INC.
1600 N. Adams St., Peoria, Ill. 61603
Tel. 309-673-9091
*V P & Treas—M. S. Sharp
*Secy—Martin Faier
V P (Purch)—Fred C. Schuster
V P (Sales)—George Triff, Jr.
V P—E. W. Boehm, Little Giant Europa, NV, Beerse, Belgium
Gen Mgr—P. V. Keipp, Little Giant Products (Western) Inc, Costa Mesa, Cal.
Adv, Sales, Prod Mgr & Art Dir—W. W. Knepp
Sales Mgr (Attachments)—R. W. Hurley
Sales Mgr (Equip)—Noel E. Zimmerman
Purch Agt—Mel Small
Sales Range: $1—3Mil Employees: 70
Also DIRECTORS
PRODUCTS: Tractor sweepers, road & runway sweepers with truck attachments, hydraulic cylinders
S.I.C. 3537; 3531; 3599; 3711

LITTLE LONG LAC GOLD MINES LTD.
101 Richmond St. W., Toronto, Can.
Tel. 416-868-1300
*Pres—J. C. L. Allen
*V P—P. A. Allen
*V P—Robert C. Stanley, Jr., 122 E. 42nd St., NYC, N. Y.
*Secy—Ian T. H. Hamilton
Accts—Thorne Riddell & Co.
*Also DIRECTORS—Other Directors Are:
D. C. Webster C. W. Webster
BUSINESS: Management, mining & exploration company
S.I.C. 7392; 1081

LITTLE MIAMI RR.
(Subs. Penn Central Transportation Co.)
Dixie Terminal Bldg., Cincinnati, Ohio 45202
Tel. 513-621-1766
*Pres—E. Webster Harrison
*V P—Joseph B. Hall
*V P—Robert W. Loder
*V P—Francis J. Gasparini
Treas—R. C. Lepley
*Secy—Robert W. Carroll
*Also DIRECTORS—Other Directors Are:
J. Grant Robins Charles S. Hill
John E. Sandefur
BUSINESS: Railroad-stock transfer
S.I.C. 4013

LITTLE MINT, INC.
1310 East 10th St., Greenville, N. C. 27834
Tel. 919-758-4146
*Chrm—George Saad
*Pres—C. Dwight Garrett
*V P—Richard Forrest
Secy & Treas—Helmut Treschan
Accts—Peat, Marwick, Mitchell & Co., Raleigh, N. C.
Sales: $5Mil Employees: 300
*Also DIRECTORS—Other Directors Are:
Robert L. Martin Leo Jenkins
BUSINESS: Oper. restaurants
S.I.C. 5812

LITTLE PRODUCTS CO.
2074 Park St., Hartford, Conn. 06106
Tel. 203-236-1248
*Chrm—Max R. Koerner
*Pres—Edward H. Little
Treas—Phillip H. O'Shan
Secy—Carl K. Dell
Sales: $1Mil Employees: 30
*Also DIRECTORS—Other Directors Are:
Charles L. Miller Charles L. Miller (Mrs.)
Edward H. Little (Mrs.)
PRODUCTS: Exercising machinery, aircraft parts
S.I.C. 3949; 3728

LITTLE ROCK ROAD MACHINERY CO.
1421 E.Ninth St., Little Rock, Ark. 72203
Tel. 501-375-4663
*Chrm—J. Gordon Wilson
*Pres—Robert J. Wilson
Treas—John R. Regan
Sales Range: $6—7Mil Employees: 75
*Also DIRECTORS
PRODUCTS: Road mach., contractors equip. (distr.)
S.I.C. 5082

LITTLE STAR FROCKS, INC.
(Subs. Seibel & Stern Corp.)
Orchard & Walnut, Bridgeton, N. J. 08302
Tel. 609-451-4200
Pres—Morris H. Seibel
Exec V-P—Monroe Seibel
V-P (Sales)—Larry Davis
V-P (Per)—Mildred Peterson
Traffic Mgr—Gilbert Spear
Accts—Irving Handel Co.
Sales: $4[illegible] Employees: 175
PRODUCTS: Children's dresses
S.I.C. 2361

LITTLE TAVERN SHOPS, INC.
1007 Ripley St., Silver Spring, Md. 20907
Tel. 301-585-6600
*Chrm & Chief Exec Officer—Harry F. Duncan
*Pres & Treas—Robert F. M[illegible]adden
V-P & Secy—George P. Mathieson
Sales: Over $5Mil Employees: 300
*Also DIRECTORS—Other Directors Are:
Robert K. Thompson
BUSINESS: Retail restaurant chain
S.I.C. 5812

LITTLE TOPSY'S INC.
130 W. 34 St., New York, N. Y. 10001
Tel. 212-239-7190
Pres—Philip Howard
V-P & Secy—Jeanne Howard
Sales & Adv Mgr—Gerald Howard
Accts—Winter, Picard & Lederman, NYC, N. Y.
Sales: $14Mil Employees: 650
PRODUCTS: Children's sportswear
S.I.C. 2361

LITTLEFIELD, ADAMS & CO.
81 Adams Dr., Totowa, N. J. 07512
Tel. 201-256-8600
*Pres—Gilbert Raff
*V-P—Clinton J. Adams
Secy & Treas—Richard W. Meany
Accts—Wolf & Co.
Sales: $16Mil Employees: 375
*Also DIRECTORS—Other Directors Are:
Lydia A. Adams Henry W. Littlefield
Philip W. Koebig, III Charles D. Fox, III
Walter N. Rowman Evelyn S. Littlefield
PRODUCTS: Paperbacks, stuffed novelties, sportswear, jackets (mfg.), books (distr.), operates retail book stores, textbook & library book publ.
S.I.C. 2731; 2329; 2399; 3961; 5041; 5199; 5942

LITTLEFORD BROS., INC.
4141 Airport Rd., Cincinnati, Ohio 45226
Tel. 513-321-9632
*Chrm—John S. Wadsworth
*Pres—Joseph G. Weger
V-P (Sales)—Daniel F. Burke
V-P (Sales)—Charles W. Ehe
V-P (Engr)—Albert J. Shohet
Secy & Treas—Chas. J. Cook
Employees: 180
*Also DIRECTORS—Other Directors Are:
William D. Littleford Robert S. Haze
Roger S. Littleford Robert H. Stegeman
William R. Seaman John S. Wadsworth, Jr.
PRODUCTS: Mixers, plate & sheet metal fabrication
S.I.C. 3559; 3443

LITTLESTOWN HARDWARE & FOUNDRY COMPANY INC.
Charles St., Littlestown, Pa. 17340
Tel. 717-359-4141
*Pres—Emory H. Snyder
*Exec V-P, Per Dir & Purch Agt—L. Robert Snyder
*Secy & Treas—Luther D. Snyder
Compt & Sales & Traffic Mgr—Henry E.
*Chief Engr—Leonard Potter
*Pub Rel Dir—Steven L. Snyder
Accts—Harry Ness & Co., York, Pa.
Sales: $4Mil Employees: 240
*Also DIRECTORS—Other Directors Are:
Rebecca Ealy
PRODUCTS: Hardware & castings
S.I.C. 3429

LITTON AERO PRODUCTS
(Div. Litton Industries, Inc.)
21050 Burbank Blvd., Woodland Hills, Cal. 91364
Tel. 213-887-3022
Pres—Charles A. Hofflund
V-P (Mktg)—Luther O. Eldridge
V-P—David L. Bjorndahl
V-P—Peter J. Cabrera
V-P—Richard M. Hodges
V-P—Leon A. Webrand
V-P—Michael R. Worstell
Admin Mgr—John C. Drew
Per Dir—Arne Ronning
Purch Agt.—Ray Smith
Traffic Mgr—Charles Krans
Employees: 270
PRODUCTS: Inertial & area navigation sys., digital computers, navigation studies

LITTON AUTOMATED BUSINESS SYSTEMS DIVISION
(Litton Industries, Inc.)
51 Penn St., Fall River, Mass. 02724
Tel. 617-676-1011
Pres—James Weidenman
V-P (Intl Mktg)—J. C. Murray
V-P (Oper & Plns)—J. Ellis
V-P (Ind Rel)—R. Panaro
V-P (Fin)—E. Weinheimer
Cont—F. Macagnone
Plt Mgr—L. James Hubbard
PRODUCTS: Computer components
S.I.C. 3573

LITTON BUSINESS SYSTEMS, INC.
(Subs. Litton Industries, Inc.)
201 E. 42nd St., New York, N. Y. 10017
Tel. 212-752-7900
Pres—Fred W. O'Green
Sr V-P—Joseph T. Casey
Sr V-P—Ludwig T. Smith
Sr V-P—Arnold R. Kaufman
Sr V-P—Joseph R. Imirie
V-P—John Grado, Jr.
V-P—Joseph P. Francini
V-P—Robert F. Kane
V-P—Justin S. Oppenheim
Treas—Charles H. Black
*Secy—George W. Fenimore
Accts—Touche, Ross & Co.
*Also DIRECTORS—Other Directors Are:
Charles B. Thornton Glen McDaniel
PRODUCTS: Calculating, adding, accounting & data processing machines, electronic computers, copying machines, typewriters, supplies, identification systems, management control systems, machines, tickets, tags, labels, nameplates, decals & specialty papers, printing, check printing, business forms, decorative laminates office design & decorative services, cash registers, office furnishings
S.I.C. 3573; 2649; 2751; 3572; 3574; 3579; 3993

LITTON DATA SYSTEMS
(Div. Litton Industries, Inc.)
8000Woodley Ave., Van Nuys, Cal. 91409
Pres—John A. Freitag
V-P (Fin)—John F. Lawrence
V-P (Bus Devel)—Thomas M. O'Donnell
V-P (Prog Mgt)—Charles A. Krause
V-P (Ship Elec)—Richard D. Fleck
V-P (Engr)—John P. Harding
V-P (Mfg)—Bertram O. Voddon
V-P (Contracts)—Edgar U. Peyronnin
Cont—S. L. Hoke
Qual Dir—William D. Raymond
Ind Rel Dir—Stephen C. Markham
Adv Mgr—Roy W. Ballard
Purch Dir—Gerald M. Stauffer
Data Proc Dir—Ralph Swanson
Mktg Dir—Richard Shivers
Pub Rel Mgr—Janice Munson
Accts—Touche Ross & Co., Los Angeles, Cal.
Sales Range: $150—200Mil Employees: 3,400

(Continued on next page)

STANDARD + POOR'S REGISTER - 1976
VOL. I

Exhibit B — Standard and Poors Register, 1976, Vol. 1; Moody's Industrial Manual, 1975, Vol. 2 and Directory of Corporate Affiliations, 1976 attached to Sevor Affidavit.

PRODUCTS: Military data proc., commun. switching equip., command & control sys.
S.I.C. 3573; 3679; 4811; 4899

LITTON DENTAL PRODUCTS
(Div. Litton Industries, Inc.)
3035 Moffat Dr., Toledo, Ohio 43615
Tel. 419-841-7751

Pres—Burton C. Borgelt
V-P (Prod Oper)—Robert D. Pabst, 1001 West U.S. 56 Hwy., Olathe, Kan.
V-P (Sales)—Richard A. Neely
V-P (Per)—Robert M. Byram
Chief Fin Officer—Donald G. Cashen
Sales Mgr—Sam B. Humphries, 1001 West U.S. 56 Hwy., Olathe, Kan.
PRODUCTS: Dental equip. & supplies
S.I.C. 3843; 5086

LITTON EDUCATIONAL PUBLISHING, INC.
(Div. Litton Industries)
450 W. 33rd St., New York, N. Y. 10001
Tel. 212-594-8660

Pres—Craig T. Senft
Exec V-P—Lawrence Jackel
V-P (Data Proc)—Pet DiLucca
V-P (Mfg)—Richard B. Long
V-P (Adm Serv)—Gerald D. Tenser
V-P (Fin)—Andrew Stenicky
Asst Treas—Lester Singer
Asst Treas—Clifton Norris, Jr.

AMERICAN BOOK CO.
Pres—James Hayes
Sr V-P & Editor-in-Chief—Bryan Bunch
Sr V-P (Mktg)—Michael Israel

VAN NOSTRAND REINHOLD CO.
Pres—Robert E. Ewing
V-P & Publ (Trade)—Jean Koefoed
V-P (Mktg)—Richard Pohanish

DELMAR PUBLISHERS
Pres—Lawrence Jackel
V-P (Mktg)—Armond Irwin
V-P (Editorial)—Alan Knofla

MCCORMICK-MATHERS PUBLISHING CO.
Pres—Donald A. Eklund
V-P & Editor-in-Chief—Anthony Quaglia

D. VAN NOSTRAND COMPANY
Pres—Hyung Pak

L.E.P.I. INTERNATIONAL
Pres—Craig T. Senft
V-P (Mktg)—Robert S. Hutchinson
Accts—Touche Ross & Co.
Employees: 650
PRODUCTS: School & college textbooks & audio visual materials, professional & reference books, arts, crafts, & general trade books
S.I.C. 2731

LITTON EDUCATIONAL PUBLISHING INTERNATIONAL
(Div. Litton Educational Publishing, Inc.)
450 W. 33rd St., New York, N. Y. 10001
Tel. 212-594-8660

Pres—Craig T. Senft, Jr.
V-P (Mktg)—Robert S. Hutchison
BUSINESS: Publishing
S.I.C. 2731

LITTON FINANCIAL PRINTING
(Div. Litton Industries, Inc.)
645 Harrison St., San Francisco, Cal. 94107
Tel. 415-957-9100

Pres—L. R. Libhart
Exec V-P—Vernon Kiep
V-P (Mfg)—Louis Ferrulli
V-P (Sales)—John McCormack
V-P (Fin)—David C. Arnoldy
Cor ... Lindberg
Employees: 60
PRODUCTS: ... & personal checks, financial printers
S.I.C. 2751, 2782

LITTON FINANCIAL PRINTING
(Div. Litton Business Systems, Inc.)
75 State Hwy. 17, Hasbrouck Heights, N. J. 07604
Tel. 201-288-4800

Exec V-P—George Paulk, 1560 W. Ogden Ave., Naperville, Ill.
V-P (Sales)—Vincent Boyce
V-P (Mfg)—Dick Jones
Compt.—Ellis Feder
Employees: 250
BUSINESS: Checks & related bank forms.
S.I.C. 2782

LITTON INDUSTRIES CREDIT CORP.
(Subs. Litton Industries, Inc.)
600 Summer St., Stamford, Conn. 06902
Tel. 203-359-2700

Pres—John H. Martin, Litton Industries, Inc., 360 N. Crescent Dr., Beverly Hills, Cal. 90210
Exec V-P & Gen Mgr—William P. Mallory
V-P—Joseph T. Casey, 360 N. Crescent Dr., Beverly Hills, Cal. 90210
V-P—Ludwig T. Smith, 360 N. Crescent Dr., Beverly Hills, Cal. 90210
V-P & Compt—Charles Duggan
V-P (Mktg & Sales)—August N. Turbie
Treas—J. G. Bloomfield
*Secy—George W. Fenimore, 360 N. Crescent Dr., Beverly Hills, Cal. 90210
Oper Mgr—W. J. Paul
Accts—Touche Ross & Co., NYC, N. Y.
Employees: 200
*Also DIRECTORS—Other Directors Are:
Glen McDaniel, Charles B. Thornton
BUSINESS: Equip. leasing & conditional sales financing for various Litton Div. products & for unrelated firms
S.I.C. 6146; 7394

LITTON INDUSTRIES, INC.
360 N. Crescent Dr., Beverly Hills, Cal. 90210
Tel. 213-273-7860

LITTON INDUSTRIES

*Chrm & Chief Exec Officer—Charles B. Thornton
*Pres—Fred W. O'Green
*Chrm Exec Comm—Glen McDaniel
Exec V-P (Professional Serv & Equip)—Joseph S. Imirie (Specialty paper, Printing & Forms Groups)
Sr V-P (Fin Affairs)—Joseph T. Casey
Sr V-P (Machine Tool Sys Group)—Burnell A. Gustafson
Sr V-P (Component Products & Ind Sys)—Arnold R. Kaufman (Office Products, Furniture & Fixtures Group)
Sr V-P (Intl Rel, Pub Affairs & Cor Commun)—Crosby M. Kelly
Sr V-P (Defense Sys Group)—James R. Mellor
Sr V-P (Corporate Affairs)—Ludwig T. Smith
Sr V-P (Office Commun Equip Group)—Gerd E. Weers
V-P (Bus Devel Defense Sys Group)—Charles S. Bridge
V-P (Med Products Divisions)—Robert I. Bruder
V-P (Guidance & Con Sys Div)—Joseph F. Caliguri
V-P (Marine Sys Group)—Leonard Erb
V-P & Secy—George W. Fenimore
V-P (Bus Mach & Ret Inf Sys Group)—Joseph P. Francini
V-P (Data Sys Div)—John D. Freitag
V-P (Computer Components Divisions)—Charles A. Gallagher
V-P (Specialty Paper Printing & Forms Division)—John Grado, Jr.
V-P (Metal Cutting Mach & Metal Products Divisions)—Nathaniel S. Howe
V-P & Pres (Monroe Div)—Robert F. Kane
V-P & Chief Coun—Robert H. Lentz
V-P (Magnetic & Components Divisions)—Phillip J. Lynn
V-P (Submarine Constr & Overhaul Oper)—Ned J. Marandino
V-P (Worldwide Ins Cr & Pension Program)—John H. Martin
V-P (Staff Asst, Bus Mach & Ret Inf Sys Group)—David K. Mutchler
V-P (Office Products Furniture & Fixtures Divisions)—Justin S. Oppenheim
V-P (Serv Components & Ind Sys Divisions)—Alex B. Owen
V-P (Litton Resources Divisions)—Booth B. Strange
Treas—Charles H. Black
Cont—Wayne L. Grosvenor
Purch Agt—Richard J. Kelly
Accts—Touche Ross & Co., Los Angeles, Cal.
Sales: Over $3 08Bil Employees: 95,000
*Also DIRECTORS—Other Directors Are:

Ransom M. Cook	M. A. Hollengreen
Don G. Mitchell	George T. Scharffenberger
Jayne B. Spain	Joseph A. Thomas
Norman B. Topping	James O. Wright

PRODUCTS: Business mach. & ret. inf sys typewriters & office copiers, specialty paper, printing & forms, office products, furniture & fixtures, navigation & con sys, commun & electronic data sys, marine engr & prod., material handling sys, electronic & electrical components, medical & electronic products, resource explor
S.I.C. 3573; 2521; 2522; 2542; 2641; 2649; 2721; 2731; 3545; 3559; 3572; 3579; 3612; 3621; 3629; 3651; 3662; 3679; 3811; 3823; 3825; 3829; 3843; 4811; 8911

LITTON MEDICAL SYSTEMS
(Div. Litton Industries, Inc.)
515 E. Touhy Ave., Des Plaines, Ill. 60018
Tel. 312-296-4488

Pres—R. B. Hyrn, Jr.
V-P (Mktg)—F. A. Barnette, Jr.
V-P (Oper)—H. De Borde
V-P (Engr)—D. O. McCauley
V-P (Fin)—... Lewis
Purch Agt—N. L. Cilfone
Employees: 1,200
PRODUCTS: X-ray apparatus & film, processors for ... & dental x-ray films, photo chemical products, ... therapy & diagnostic equip.
S.I.C. 3693; 3841; 3861

LITTON MEMORY PRODUCTS
(Div. Litton Industries, Inc.)
8020 Deering Ave., Canoga Park, Cal. 91...
Tel. 213-884-4600

Pres—Robert T. Lurvey
V-P—John Ross
Compt—Robert Barton
Chief Engr.—Robert Lepore
PRODUCTS: Core memory stacks & sys. for mini-, O.E.M.'s & users; services include complete design or build to print
S.I.C. 3571

LITTON MICROWAVE COOKING PRODUCTS
(Div. Litton Industries, Inc.)
400 Shelard Plaza, S., Minneapolis, Minn. 55426
Tel. 612-553-2000

Pres—William W. George
V-P (Oper)—Paul R. Westgard
V-P (Consumer Sales)—Edward J. Ward
V-P (Comml Sales)—Richard H. Vaughan
V-P (Fin)—Richard Jackson
V-P (Engr)—Verle D. Blaha
V-P (Human Resources)—Douglas Baker
Pres (Mktg & Sales Div)—Dan R. Cavalier
Dir Sales Admin—Marvin Mueller
Dir Mktg Commun—James W. Shorr
Dir Purch—Lee Hanson
Dir Mgt Inf Serv—Ray Thies
Mgr Pub Rel—Richard L. Parrish
Employees: 1,100
PRODUCTS: Microwave ovens & accessory products for use in home & industry
S.I.C. 3631; 3589

LITTON OFFICE PRODUCT CENTERS, MID-ATLANTIC REGION
(Div. Litton Industries, Inc.)
505 Broadway, New York, N. Y. 10012
Tel. 212-966-2500

Pres—Robert P. Bosley, 267-06 Hillside Ave., Floral Park, N. Y. 11004
V-P—Stephen Appel
Accts—Touche Ross & Co., NYC, N. Y.
Employees: 120
PRODUCTS: Office supplies & furniture, printing
S.I.C. 5943; 2751

LITTON OFFICE PRODUCTS CENTERS, NEW ENGLAND REGION
(Div. Litton Industries, Inc.)
184 Windsor Ave., Wilson, Conn. 06095
Tel. 203-522-2291

Pres—Robert P. Bosley, 267-06 Hillside Ave., Floral Park, N. Y. 11004
V-P—Barry Chesler
Accts—Touche Ross & Co., NYC, N. Y.
Employees: 105
PRODUCTS: Office supplies & furniture, printing
S.I.C. 5943; 2751

LITTON OFFICE PRODUCTS CENTERS, SOUTHEASTERN REGION
(Div. Litton Industries, Inc.)
1101 E. Laburnum Ave., Richmond, Va. 23227
Tel. 804-329-3561

Pres—Gerald Gholson
Accts—Touche Ross & Co.
Employees: 178
PRODUCTS: Office supplies & furniture, printing
S.I.C. 5943; 2751

LITTON OFFICE PRODUCTS CENTERS, SOUTHWESTERN REGION
1600 N. Main St., Houston, Tx. 77009
Tel. 713-223-6204

V-P—John Crawford
Accts—Touche Ross & Co., New York, N. Y.
Employees: 200
PRODUCTS: Office supplies & furniture, printing
S.I.C. 5943; 2751

LITTON OFFICE PRODUCTS CENTERS, WESTERN REGION
(Div. Litton Industries, Inc.)
364 S. Anderson St., Los Angeles, Cal. 90033
Tel. 213-269-7451

Pres—Robert P. Bosley, 267-06 Hillside Ave., Floral Park, N. Y. 11004
Pres (Western Region)—Norman Pell
Accts—Touche Ross & Co., NYC, N. Y.
... employees (us)
PRODUCTS: Office supplies & furniture; printing
S.I.C. 5943; 2751

Exhibit B — Standard and Poors Register, 1976, Vol. 1; Moody's Industrial Manual, 1975, Vol. 2 and Directory of Corporate Affiliations, 1976 attached to Sevor Affidavit.

LITTON BEAVER TRANSMISSION DIV.
(Subs. Litton Industries, Inc.)
41 N. Main St., West Hartford, Conn. 06107
Tel. 203-521-7100
Pres—Robert L. Cole
V-P (Mfg.)—Paul J. Goret
V-P (Sales)—Robert J. Grady
V-P (Engr.)—Stan M. Sitta 4545 S. Western Blvd., Chicago
V-P Gen Mgr—Eugene S.A. Balkoff
Compt—James E. O'Brien
Sales Mgr—John B. Jeans, Jr. 101 Queens Dr., King of Prussia, Pa.
Adv Mgr—Richard W. Keiler
Dir Per & Ind Rel—J. Thomas Bouchard
Group Prod Mgr—Clif R. Morgan Chicago
Pub Rel Dir—Richard W. Keiler
Sales Range: $40—50Mil Employees: 1,850
PRODUCTS: Chain, speed reducers, gearmotors, allied power transmission products
S.I.C. 3566

LITTON PRECISION GEAR
(Div. Litton Industries, Inc.)
4545 South Western Blvd., Chicago, Ill. 60609
Tel. 312-847-4211
Pres—Robert S. Kocourek
Cont—Robert J. Thomas
Sales & Engr Mgr—Joseph M. Oichawa
Per Dir—Thomas F. McNamara
Purch Agt—Harry R. Mathews
Chief Engr—Andrew Sompolski
Employees: 275
PRODUCTS: Aircraft parts & auxiliary equip.
S.I.C. 3729

LITTON RESTON COMPUTER CENTER
(Div. Litton Industries, Inc.)
1831 Michael Faraday Dr., Reston, Va. 22090
Tel. 703-471-9200
Gen Mgr—James F. Sperger
Dir Mktg—James Harrington
BUSINESS: Data processing service bureau
S.I.C. 7374

LITTON UNIT HANDLING SYSTEMS
(Div. Litton Systems, Inc.)
7100 Industrial Rd., Florence, Ky. 41042
Tel. 606-371-6430
Pres—Gordon Palmer
V-P (Mktg & Sales)—Lloyd Robertson
V-P (Engr)—Charles Zehr
Secy & Treas—Eugene Durll
Compt—Harry Barlage
Adv Mgr & Pub Rel Dir—David Parlin
Per Dir—Patrick Byrns
Purch Agt—James Collins
Data Proc Mgr—Charles Green
Product Mgr—Edward Burgasser
Product Mgr—Walter Fister
Product Mgr—Robert Sibthorp
Traffic Mgr—Gary Black
Accts—Touche Ross & Co., New York, N. Y.
Employees: 445
PRODUCTS: Chainveyor, palletizer, robot sys., conveyor systems & components
S.I.C. 3535

LITTONIAN SHOE CO.
Littlestown, Pa. 17340
Tel. 717-359-5194
Pres & Prod Mgr—Charles E. Ritter
V-P—Carl E. Ritter
Secy, Treas & Sales Mgr—Luther W. Ritter
Accts—Harry Ness & Co., York, Pa.
Sales $1Mil Employees: 78
*Also DIRECTORS—Other Directors Are:
Robert L. Ritter
PRODUCTS: Infants' shoes
S.I.C. 5661

LITVAK MEAT COMPANY
5900 York St., Denver, Colo. 80216
Tel. 303-238-0766
Chrm—Joe Litvak
Pres—Leonard Litvak
V-P (Fin)—Paul Ramadan
V-P (Fin)—Richard Sheldon
V-P—Jake Litvak
Sales Mgr—Jack Renke
Chief Engr—Ed Walz
Traffic Mgr—Rod Barringer
Pub Rel Dir—A. Andrews
Accts—Touche Ross & Co., Denver, Colo.
Sales $100Mil Employees: 225
*Also DIRECTORS
PRODUCTS: Beefs, fabricated beef cuts & beef by-products
S.I.C. 2011; 2013; 5147

LIVE OAK, PERRY AND SOUTH GEORGIA RY.
(Subs. Southern Railway)
900 15th St., N. W, Washington, D. C. 20005
Tel. 202-628-4460
Pres—W. Graham Claytor, Jr.
V-P—J. L. Tapley
V-P—Edward T. Breathitt, Jr.
V-P—Earl L. Dearhart
V-P—S. S. Wilbanks
*V-P—R. S. Hamilton
*V-P—A. H. Douglas
*V-P—J. S. Crane
V-P—L. L. Jones
V-P—H. H. Hall
V-P—Edward G. Kreyling, Jr.
*V-P—A. B. McKinnon
V-P—W. W. Simpson
V-P—K. A. Stoecker
V-P—W. D. McLean
*V-P—G. S. Paul
Treas—George M. Williams
Secy—M. M. Davenport
Compt—D. R. McArdle
*Also DIRECTORS—Other Directors Are:

M. F. Akers	Ned P. Bratford
James O. Cooke, Jr.	Judson B. Faircloth
William A. Fickling, Jr.	George W. Harmony
John M. McElrath, Jr.	J. Harley Mitchell
Jim Paulk	Ralph Pinkerton
W. L. Pippin	Alfred J. Powell
J. Powell Puckett	Frank S. Steele
J. C. Thomas, Jr.	Henry M. Ward, Sr.
Hamlin N. West	E. B. Williams

S.I.C. 4011

H. F. LIVERMORE CORPORATION
Allston Station, Boston, Mass. 02134
Tel. 617-782-2800
*Pres & Chief Exec Officer—W. R. Meah
Secy—Rush B. Lincoln, Jr.
Cont—Richard H. Pierce
*Gen Coun—James B. Ames
Material Mgr—Philip DeSantis
Accts—Price Waterhouse & Co., Boston, Mass.
Employees: 100
*Also DIRECTORS—Other Directors Are:
Junius H. Garrison, Jr.
PRODUCTS: Improved loom parts, warp knitting machine repair parts
S.I.C. 3552

LIVERMORE SHOE CO.
(Div. Bennett Importing Co., Inc.)
19 Bennett St., Lynn, Mass. 01905
Tel. 617-598-5300
*Pres & Treas—Ted Poland
V-P—Donald N. Miller
*Secy—Aaron J. Bronstein, 85 Devonshire St., Boston
Compt—Leo Gauthier
Sales Mgr—Charles M. Haley
Accts—Sherman, Bernson, Rosenberg & Schneider, Boston, Mass.
Sales Range: $9—12Mil Employees: 900
*Also DIRECTORS—Other Directors Are:
Mildred Poland
PRODUCTS: Women's shoes
S.I.C. 3144

LIVERNOIS ENGINEERING CO.
25200 Trowbridge St., Dearborn, Mich. 48124
Tel. 313-278-0200
Pres & Treas—Bernard J. Wallis
V-P—S. Bianchi
Secy—S. Blanton
Purch Agt—George Stauch
Office Mgr—H. Miller
Sales Range: $1—3Mil Employees: 200
PRODUCTS: Tools, dies, spec. mach. & transfer feeds
S.I.C. 3544

LIVERPOOL INDUSTRIES, INC.
162 57th St., Brooklyn, N. Y. 11220
Tel. 212-492-0770
*Pres—Heinz B. Ostheimer
V-P (Sales) & Treas—Jerry L. Weiss
V-P (Prod)—Jack Biando
V-P (Mktg)—Anthony Grillo
*Secy—Margot Ostheimer
Purch Agt—Paul McGowan
Chief Engr—Sam Packer
Accts—Renc & Fromm, NYC, N. Y.
Sales: $3Mil Employees: 95
*Also DIRECTORS—Other Directors Are:
Lothair Szerlip
PRODUCTS: Precision sheet metal & machined parts
S.I.C. 3444

LIVERS BRONZE CO.
1608 S. Marsh Ave., Kansas City, Mo. 64126
Tel. 816-833-2828
*Chrm & Pres—Richard A. Livers
*Secy & Treas—Harold F. Livers
Traffic Mgr—John Renken
Works Mgr—Bill Snyder
Sales: $2Mil Employees: 100
*Also DIRECTORS
PRODUCTS: Plaques, metal letters, grilles, aluminum railings
S.I.C. 3362; 3446

LIVING WINDOWS CORP.
13211 Old Westheimer Rd., Houston, Texas 77036
Tel. 713-497-8300
Chrm & Pres—Timothy J. Crocin
V-P—Robert L. Lenz
Secy & Treas—Louise Conn
Accts—Verbket, Cunaniss & Ross
Sales: $4Mil Employees: 200
PRODUCTS: Aluminum windows & doors
S.I.C. 3442

LIVINGSTON BROS., INC.
Grant & Geary, San Francisco, Cal. 94108
Tel. 415-362-3060
*Hon Chrm—Brunn Livingston
*Chrm—Carl Livingston
*Pres—Carl Livingston, Jr.
Exec V-P—Barry Livingston
Secy & Treas—H. Stiebel
Adv Mgr—Blanche Hyun
Purch Agt—C. McCarty
Traffic Mgr—H. Stiebel
Employees: 450
*Also DIRECTORS—Other Directors Are:
M. Magnani (Mrs.) Eleanor Sloss
BUSINESS: Specialty store
S.I.C. 5311

LIVINGSTON-GRAHAM, INC.
(Div. Brown Co.)
5500 N. Peck Road, El Monte, Cal. 91732
Tel. 213-358-1811
*Exec V-P & Gen Mgr—J. W. Watkins
*V-P (Sales)—T. A. Lipman
*V-P (Admin)—A. R. Dyck
Accts—Ernst & Ernst
Sales Range: $30—40Mil Employees: 600
*Also DIRECTORS
PRODUCTS: Rock, sand, gravel & concrete
S.I.C. 3295; 3272; 7359; 5211

LIVINGSTON INDUSTRIES LTD.
Tillson Ave., Tilsonburg, Ont. Can.
Tel. 519-842-4211
*Chrm—Gerald V. Livingston
*Pres—G. F. Francolini
*Exec V-P—A. H. Wade
Secy & Treas—T. A. Logan
Compt—B. J. Parent
*Sales Mgr—William Anderson
Purch Agt—T. J. Sheahan
Accts—Clarkson Gordon & Co., London, Ont.
Sales: $48Mil Employees: 1,600
*Also DIRECTORS—Other Directors Are:

D. H. Gordon	F. W. P. Jones
George L. Mitchell	James V. Plant
R. M. Ivey	L. F. Stevens

PRODUCTS: Export packaging service, warehousing, transp., wooden boxes, corrugated boxes & fork tines
S.I.C. 7399; 2441; 2653

J. LIVINGSTON & CO.
489 Fifth Ave., New York, N. Y. 10017
Tel. 212-490-1400
*Pres—George W. Kramer
*Exec V-P—H. Ralph Teese
V-P—Howard R. Teese, Jr.
*Secy & Treas—Frank Bastone
Accts—Martin Kortjohn & Co, NYC, N. Y.
*Also DIRECTORS
BUSINESS: Construction
S.I.C. 1629

LIVINGSTON NATIONAL BANK
Livingston, N. J. 07039
Tel. 201-992-5600
*Chrm—William H. Conover
*Pres—Francis V. Ritter
*Also DIRECTORS—Other Directors Are:

Robert B. DeCamp	William F. Hegarty
Herbert J. Mitschele	Anthony Scala
H. Edward Tonet	Charles G. Zahn
Robert W. Kean	Emanuel P. Goldblatt

S.I.C. 6025

LIVINGSTON-NEWMAN INC.
468 W. Broadway, New York, N. Y. 10012
Tel. 212-777-1760
Pres & Treas—Ralph Newman
Exec V-P—George Lynne
Accts—Seth D. Keit
Sales: Under $1Mil Employees: 60
PRODUCTS: Paper set-up boxes
S.I.C. 2652

LIZZA ASPHALT CONSTRUCTION CO.
EastNorwich Rd., Oyster Bay, N. Y. 11771
Tel. 516-922-4700
*Chrm & Pres—Elia E. Lizza
*V-P—James Madden
Secy—Richard F. Murphy
Compt—James Orlowski
Purch Agt—John Horan
Chief Engr—John W. Slawson
Employees: 400
*Also DIRECTORS
PRODUCTS: Asphalt, road constr, driveways
S.I.C. 2911; 1611

LLOYD CHAIN CORP.
2500 E. First St., Maryville, Mo. 64468
Tel. 816-582-2161
*Pres & Chief Exec Officer—Don M. Schlueter
*Treas—Ronald Baker
Sales Mgr—Robert H. Todd
Purch Agt—Whitey Ford
Pit Mgr—Robert Crabb
*Office Mgr—Crystal Wright
Pit Engr—Pat Lueshinger
Accts—Ronald Barker

(Continued on next page)

Exhibit B — Standard and Poors Register, 1976, Vol. 1; Moody's Industrial Manual, 1975, Vol. 2 and Directory of Corporate Affiliations, 1976 attached to Sevor Affidavit.

*Also DIRECTORS—Other Directors Are:
Robert J. Kennedy — John F. A. Stevens
William P. Wood — Thomas W.L. Cameron
Edmund L. Zalinski — Carter L. Schelling
PRODUCTS: Ind. pipe, valves, fittings & steam specialties (distributors)
S.I.C. 5074

McARDLE PRINTING CO.
1140 East West Hwy., Silver Spring, Md. 20910
Tel. 301-588-5025

*Pres—Walter F. McArdle
*Exec V-P & Sales Mgr—Edward J. McArdle
V-P (Plt Oper)—E. A. Dickson
V-P (Prom & Pub Rel)—Ralph N. Ives
V-P (Ind Rel & Per)—Virgil W. Wright
*Secy & Treas—Paul D. Stout, Jr.
Purch Agt—C. Huth
Accts—Ernst & Ernst, Washington, D. C.
Employees: 285
*Also DIRECTORS
PRODUCTS: Commercial printing
S.I.C. 2751; 2754

McATEE BOLT CO., INC.
4925 E. 38th Ave., Denver, Colo. 80207
Tel. 303-399-6277

Pres—Bruce V. Prather
Exec V-P & Treas—Benjamin Lombard
Secy—Charleen G. Prather
Accts—Cordell & Associates, Denver, Colo.
Sales: Under $1Mil
PRODUCTS: Special bolts, nuts & fasteners
S.I.C. 3452; 3499

McAVOY VITRIFIED BRICK CO.
Phoenixville, Pa. 19460
Tel. 215-933-2932

*Pres—John C. McAvoy
*V-P (Prod)—Thomas B. McAvoy, III
*V-P & Secy—Donald R. McAvoy
V-P (Coord Sales & Prod)—R. Kimbel Colket
*Treas—Rachel C. McAvoy
Accts—Ernst & Ernst
Employees: 85
*Also DIRECTORS—Other Directors Are:
J. Creighton McAvoy
PRODUCTS: Common & face brick
S.I.C. 3251

McBEE LOOSE LEAF BINDER PRODUCTS
(Div. Litton Industries, Inc.)
424 N. Cedarbrook, Springfield, Mo. 65801
Tel. 417-866-0822

V-P & Gen Mgr—Carl D'Angelo
Natl Sales Mgr—Harry S. Johnston
Per Dir—Larry L. Griffis
Purch Agt—John P. Witt
Product Mgr—Rick L. Creson
Mgr Mfg & Engr—Bill J. Doolittle
Prod Sup—Donald J. Tucker
Dir Mfg—Jack M. Stevens
Mgr Materials Con—Wayne Dixon
Employees: 330
PRODUCTS: Loose leaf binder products
S.I.C. 2782

FRANK A. McBRIDE CO.
233 Central Ave., Hawthorne, N. J. 07507
Tel. 201-423-1123

*Chrm—Frank V. McBride
*Pres & Treas—Joseph A. McBride
*Exec V-P—J. Nevins McBride
Sr V-P—E. Thompson Best
*V-P—Frank V. McBride, Jr.
*Secy—Edward S. O'Connor
*Compt—Daniel J. McBride
Purch Agt—Thomas Maggio
Chief Engr—Harold F. Hoertel
Projects Coordinator—Donald Watson
Prod Mgr—Nicholas Filippone
Accts—Hauser O'Connor & Hybird
Sales: $25Mil Employees: 800
*Also DIRECTORS
BUSINESS: Mechanical contractor
S.I.C. 1711

W. C. McBRIDE, INC.
25 N. Brentwood Blvd., St. Louis, Mo. 63105
Tel. 314-725-8666

*Pres & Treas—Adelaide M. Schlafly
*Exec V-P—R. J. Connors
*V-P—W. D. Orthwein, III
*V-P—F. R. Schallom
Secy—M. L. Hyde
Tax Accts—N. E. Ritter
Purch Agt—J. R. Kuchnie
Mgr (Land Dept)—J. C. Roan

W.C. MCBRIDE, INC.
Box 469, Centralia, Ill. 62801
Tel. 618-532-7355
Prod Supt—Howard Bell
Engr—Charles S. Vaccaro

W.C. MCBRIDE, INC.
Denver Club Bldg, Denver, Colo. 80202
Tel. 303-825-2366
Prod Supt—David Paoli
Engr—Norman Erdman

W.C. MCBRIDE, INC.
Mayo Bldg, Tulsa, Okla. 74103
Tel. 918-583-6153
Div Prod Supt—R. R. Loring
Prod Foreman—L. H. Burgoon

CANADIAN W.C. MCBRIDE, INC.
Denver Club Bldg, Denver, Colo. 80202
Prod Supt—David Paoli
Engr—Norman Erdman
*Also DIRECTORS—Other Directors Are:
Wm. McBride Love
PRODUCTS: Oil producer
S.I.C. 1311

McCABE-POWERS BODY CO.
8900 Frost Ave., St. Louis, Mo. 63134
Tel. 314-524-8000

*Chrm, Pres & Treas—Edward J. Powers, III
Exec V-P (Sales)—Carlisle D. Kinyon
V-P (Engr)—Roy Balogh
V-P (Mfg)—A. Poelker
Secy & Cont—N. F. Ladd
Purch Agt—M. Kliethermes
Supt—Vonda Christian
Accts—Anders & Minkler, St. Louis, Mo.
Employees: 500
*Also DIRECTORS—Other Directors Are:
John Kappel — Marie Sontag
Harriet Powers
PRODUCTS: Coml & utility type truck bodies, hydraulic towers, ladders, winches, derricks & articulated beams, pole and reel trailers, truck bodies & hydraulic equip
S.I.C. 3711; 3531; 3537; 3713; 3715

M. P. McCAFFREY, INC.
2121 E. 25th St., Los Angeles, Cal. 90058
Tel. 213-588-7181

*Pres—Thomas M. McCaffrey
Sales Mgr—Ed W. King
Dir Adv & Per—Thomas J. Koetters
Purch Agt—Thomas Salyers
Chief Engr—Ambrose Confalonieri
Works Mgr—Raymond W. Swanson
Employees: 80
*Also DIRECTORS
PRODUCTS: Clamshell, dragline & backhoe buckets, rock tongs & rock grapples, sweeping attachments for fork lifts
S.I.C. 3531

McCAFFREY & McCALL, INC
575 Lexington Ave., New York, N. Y. 10022
Tel. 212-421-7500

*Chrm & Chief Exec Officer—David B. McCall
*Vice-Chrm, Secy & Treas—Michael J. Manning
*Pres—Don Durgin
*Exec V-P (Co-Creative Dir//Copy)—George R. Newall
*Exec V-P (Media-Research & Broadcasting)—James J. Tommaney
*Exec V-P (Co-Creative Dir//Art & TV Prod)—Thomas G. Yohe
Sr V-P—Martin R. Bowen
Sr V-P—Douglass M. Bomeisler
Sr V-P—John B. Collins
Sr V-P—Stephen R. Fajen
*Sr V-P—Donald C. Goss
Sr V-P—Peter J. Hahn
Sr V-P—Mary Grace Hannon
Sr V-P—R. Bruce Montgomery
*Sr V-P—Robert Raymond
Sr V-P—Robert N. Schancupp
Sr V-P—William T. Shaw
Sr V-P—John A. Sidebotham, Jr.
*Sr V-P—Radford Stone
*Sr V-P—Margaret G. Wasley
Sr V-P—William H. Ziegler
V-P—Kevin Begos
V-P—David Bennett
V-P—William E. Bolster
V-P—Jay E. Bottomley, Jr.
V-P—John C. Byrnes
V-P—Nen Costa
V-P—James M. Earl
V-P—Marianne Fetter
V-P—Stanley S. Forman
V-P—Peter A. Gnoffo
V-P—Robert V. Graham
V-P—Joanne T. Griffin
V-P—Paul Gunsbanner
V-P—George C. Hadley
V-P—Michael E. Hvidonov
V-P—Zelda Levine
V-P—John G. Likakis
V-P—Leonard J. Lowy
V-P—Peter Manley
V-P—Bernadette J. McNeil
V-P—Marian Miller
V-P—Richard W. Murray
V-P—Richard J. Pheasant
V-P—Carol L. Ruley
V-P—Theodore T. Teitus
V-P—Frederick A. Roehm
V-P—Thomas V. Spencer
V-P—Alfred H. Roswig
V-P—David A. Stickles
V-P—Joseph P. Sutton
V-P—Ralph S. Thomas
V-P—William J. Visser
Employees: 450

*Also DIRECTORS—Other Directors Are:
Morton L. Janklow
BUSINESS: Advertising agency
S.I.C. 7311

McCAIN MFG. CORP.
6200 W. 60th St., Chicago, Ill. 60638
Tel. 312-586-6200

Pres—William B. McCain
V-P (Mktg)—Charles J. Nesbitt
V-P (Engr)—James F. Cosgrove
Treas—M. L. Greeley
Secy—W. Scott McDowell
PRODUCTS: Bookbinding machinery
S.I.C. 3555

McCAIN UNIFORM CO.
2208 Third Ave., N., Birmingham, Ala. 35203
Tel. 205-323-3417

Pres—Maurice Edward McCain
Secy & Treas—Florence Snowden McCain
Accts—Deni & Co., Birmingham, Ala.
Sales: Over $2Mil Employees: 2?
Directors Are:
Peter Lebowitz
PRODUCTS: Uniforms work clothing, law enforcem equip
S.I.C. 2311; 2338

McCALL CORP.
(Subs. Norton Simon, Inc.)
277 Park Ave., New York, N. Y. 10017
Tel. 212-832-1000

*Pres—Charles D. Aikman, 6013 Amos Pl., Kettering, Ohio 45429
V-P (Ind Rel)—Herbert J. Levine, 43 Count. Ridge Dr, North Rye, N. Y.
V-P, Secy, Treas & Gen Coun—Bernard Rowe, 835 Nancy Way, Westfield, N. J.
*Gen Mgr—E. G. Bewkes, 2 Ox Ridge Lane, Darien, Conn.
Accts—Haskins & Sells
Sales Range: $100—200Mil Employees: 5,000
*Also DIRECTORS—Other Directors Are:
David J. Mahoney — E. G. Bewkes, Jr.
Joseph H. Gamache
BUSINESS: Publication printing
S.I.C. 2721

McCALL OIL & CHEMICAL CORP.
808 S.W. 15th Ave., Portland, Ore. 97205
Tel. 503-228-2600

*Chrm—William Calder McCall
*Vice-Chrm (Pres-Great Western Chemical Co)—Ernest H. McCall
*Pres—Robert H. McCall
Exec V-P (Southern Chem Div)—Robert W. Laws
*V-P & Secy—Robert W. Hendrickson
V-P (Whl Sales-Oil Div)—William L. Moersch
V-P (Ret Sales-Oil Div)—Ted L. Anderson
Treas—Floyd Packer
Purch & Traffic Mgr—Cooper Jones
Constr Mgr—Peter Piluso
Accts—Ernst & Ernst, Portland, Ore.
Sales Range: $60—65Mil Employees: 300
*Also DIRECTORS—Other Directors Are:
Marian H. McCall
PRODUCTS: Industrial chemicals & heating oils (distr)
S.I.C. 5161

McCALL PATTERN CO.
230 Park Ave., New York, N. Y. 10017
Tel. 212-983-3200

*Pres—Earle K. Augstadt, Jr.
Sr V-P (Sales)—Sydney H. Keane
Sr V-P—Michael Lichtenstein
V-P (Sales)—E. Gordon Young
Secy & Treas—Charles E. Oberle
Cont—James J. Oliver
*Also DIRECTORS—Other Directors Are:
E. Garrett Bewkes, Jr. — David J. Mahoney
Castle N. Day
BUSINESS: Publishing fashion patterns
S.I.C. 2741

MCCALL PRINTING CO.
(Div. Norton Simon, Inc.)
2219 McCall St., Dayton, Ohio 45401
Tel. 513-268-6551

Pres—Charles Aikman
V-P (Fin)—William Spence
V-P (Ind Rel)—Hal Gochring
V-P (Mfg & Engr)—Cliff Miller
V-P (Sales)—George Avery
V-P (Sales Serv)—Ted Barklow
Accts—Haskins & Sells
Directors Are:
David J. Mahoney — E. Garrett Bewkes, Jr.
BUSINESS: Publication printing
S.I.C. 2721; 2731

McCALL PUBLISHING CO.
(Subs. Refco Interprises Ltd.)
230 Park Ave., New York, N. Y. 10017
Tel. 212-983-3200

*Chrm & Secy—Ralph Wienshienk
*Pres & Pub—Raymond Eyes
*Exec V-P & Editor—Robert Stein
V-P (Prod)—Lowell Logan

Exhibit B — Standard and Poors Register, 1976, Vol. 1; Moody's Industrial Manual, 1975, Vol. 2 and Directory of Corporate Affiliations, 1976 attached to Sevor Affidavit.

SWECO, INC.
6033 E. Bandini Blvd., Los Angeles, Cal. 90051
Tel. 213-726-1177



*Chrm—R. P. Miller, Jr.
*Pres—H. W. Wright, Jr.
*Adm V-P (Per)—R. C. Miller
V-P (Mfg)—J. R. Freeman
V-P (Sales)—Z. E. Mouradian
V-P & Treas—R. H. Chambliss
V-P & Mgr (Proc Equip Div)—J. K. Sjogren
Secy—Peggy R. Fitzmorris
Mgr Adv & Pub Rel—R. W. Kensgy
Mgr Materiel—J. E. Hones
Mgr Mfg—C. D. Davis
Accts—Peat Marwick, Mitchell & Co., Los Angeles, Cal.
Sales: $25Mil Employees: 550 (Inc Subs)
*Also DIRECTORS—Other Directors Are:
G. W. Clemson W. S. Pallette
L. A. Weller R. J. Wilcox
PRODUCTS: Process, metalworking & oil drilling equip
S.I.C. 3569

SWEDA INTERNATIONAL
(Div. Litton Industries, Inc.)
34 Maple Ave., Pine Brook, N. J. 07058
Tel. 201-575-8100
Pres—Joseph P. Francini
Sr V-P—Charles S. Adams
V-P (Sales)—Thomas T. Harding
PRODUCTS: Sales registers, electronic point of sale sys., electronic billing & accts. machine sys., tape punches, peripheral equip.
S.I.C. 3573; 3574

SWEDEN FREEZER MFG. CO.
3401 17th Ave., W., Seattle, Wash. 98119
Tel. 206-283-9200
*Pres—Harvey F. Swenson
*Exec V-P & Treas—Carl E. Swenson
*V-P (Prod)—Ludvig J. Aspen
V-P (Mktg)—C. D. Hurley
Asst to Pres—Joseph E. Hunt
*Secy—Nora M. Swenson
Purch Agt—James F. Trethewey
Accts—Baumgartner, Nielsen, Kueckelhan & Hull, Seattle, Wash.
Sales: $5Mil Employees: 500
*Also DIRECTORS—Other Directors Are:
Charles L. Burton
PRODUCTS: Soft ice cream & milk shake machines, soda fountains, frozen carbonated beverage machines, artificial kidney equipment & related supplies, refrigeration equip.
S.I.C. 3551; 3585; 3841

SWEDISH BALL BEARING CO.
(Div. AB Svenska Kullagerfabriken)
Hornsgatan 1, S-415 50 Goteborg Sweden
Tel. 31840000
Chrm—Folke Lindskog
Mgn Dir—Lennart Johansson
Dir Commun—Olle Warneby
Dir Engr & Research—Ingemar Fernlund
Dir Legal—Gunnar Ghmstedt
Dir Inf Sys—Tedric A. Harris
Dir Fin—Sten Kjellman
Dir Per & Orgn—Krister Peil
Dir Mktg—Wolf von Schlesnitz
Dir Mfg Engr—Bertil Strom
Dir (Plan)—Benct Akesson
Employees: 59,639
PRODUCTS: Rolling bearings & accessories, steel, textile machinery components grinding machines, thread cutting tools, twist drills
S.I.C. 3562; 3312; 3541; 3545; 3552

SWEDISH MATCH CO.
Box 16100, Stockholm, Sweden S-10322
Tel. 08/22 06 20
*Chrm—Erick Boheman
*Dep Chrm—Lars Erick Thunholm
Treas—Hans Sundbed
Group Cont—Torleif Knutsson
Chief Staff Officer—Sten Rysted
Per Admin—Waldemar Norrman
*Group Mgn Dir—Rolf Dennoff
*Dep Group Mgn Dir—Sverker Overson
Mgr Mach Div—Lars Kemmer
Mgr Purchasing Div—Bertil Turesson
Mgr Match Div—Stig Ramquist
Mgr Interior Prod Div—Willi Senn
Mgr Board Div—Gunnar Jordansson
Mgr Lighter Div—Lars Erik Hallden
Mgr Paper Div—Klaus Dieter Link
Mgr Bldg Components Div—Arne Jonsson
Mgr Instrument Div—Rolf Lindell
Bus Control—Bertil Aberg
Special Assignments—Stig Zetterberg
Pub Affairs & Comm—Touvo Sibirzeff
Accts—Price Waterhouse & Co., Stockholm, Sweden
Sales: $611Mil Employees: 36,500
*Also DIRECTORS—Other Directors Are:
Ake Bergqvist Holger Crafoord
Bo Ehrner Carl de Geer
Hugh Kindersley Rudolf Pfennig
Rene Sargent Peder Sager
PRODUCTS: Floor & wall coverings, wallboard & sawn timber, doors, windows, furniture, flexible pkg. material, matches, lighters, specialized mach. for tobacco ind., foundries & pkg., auto components, refuse handling, card board, real estate, mgt. equip. sales & leasing, chemicals
S.I.C. Some: 2426; 2434; 2621; 2631; 3272; 3559; 4953; 5013; 5531; 7399

SWEDLOW INC.
12122 Western Ave., Garden Grove, Cal. 92645
Tel. 714-893-7531
*Chrm, Pres & Chief Exec Officer—David A. Swedlow
V-P—Paul H. Bottorff
V-P, Treas & Cont—Mack S. Chases
V-P—Brian [illegible]
*V-P & Secy—[illegible] Gold
V-P—John B. Mc[illegible]
V-P—Irvin D. Miller
Accts—Peat Marwick Mitchell & Co., Santa Ana, Cal
Sales Range: $25—30Mil Employees: 575
*Also DIRECTORS—Other Directors Are:
Gloria Shimer Stanley Simon
Belmont Towbin
PRODUCTS: Cast acrylic sheet, aircraft transparencies, high temperature reinforced laminates
S.I.C. 3079

B. K. SWEENEY MFG. CO.
6300 Stapleton South Dr., Denver, Colo. 80216
Tel. 303-355-2355
*Chrm—Bayard K. Sweeney, Jr.
*Pres—John F. Sweeney
*V-P (Sales)—Bayard K. Sweeney, III
V-P (Engr)—Edward T. A[illegible]
V-P (Mfg)—William Schaefer
Adv Mgr—Philip R. Spuck
Purch Agt—Everett Sedwick
Accts—Cooper, A Lybrand
Sales: $4Mil Employees: 150
*Also DIRECTORS—Other Directors Are:
Max Moritz
PRODUCTS: Special tools & equip. (service) for aircraft, RR., trucking, marine & oil industries, etc., electronic instruments
S.I.C. 3546; 3423; 3549; 3825

SWEENEY & CO
P. O. Box 721, San Antonio, Texas 78292
Tel. 512-533-1281
*Chrm, Chief Exec Officer & Pres—Edward M. Sweeney
*V-P (Per)—George J. Ames
*Treas—Otto Foerster
*Secy & Comptr—Leland L. Harris
Sales Mgr—Sherman S. Simmons
Adv Mgr—Elmer Emerson
Purch Agt—Donald Manville
Data Proc Mgr—Franklin Miksch
Chief Engr—Frank Stromboe
Traffic Mgr—Horace McBride
Prod Mgr—Joseph Winkler
Accts—Ernst & Ernst
Employees: 776
*Also DIRECTORS—Other Directors Are:
Edward M. Sweeney (Mrs.)
PRODUCTS: Groceries (Whl.)
S.I.C. 5141

R. E. SWEENE & CO., INC.
P.O. Box 1921, 3700 Noble, Fort Worth, Texas 76101
Tel. 817-834-9191
Pres—Robert E. Sweeney
Exec V-P—Richard J. Stockinger
Treas—Hal P. Hughes
Secy—Jos W. Moore
Accts—Weaver & Tidwell, Forth Worth, Texas
Sales: $8Mil Employees: 100
PRODUCTS: Whl. lumber yard
S.I.C. 5031

SWEET MFG. CO.
1122 Jackson St., Dallas, Texas 75202
Tel. 214-742-0038
*Chrm—Albert Sweet
*Pres—Harold Sweet
*Exec V-P—Harry Kriss
V-P(Sales)—Milton Dreeben
*Treas—Max Neuman
Accts—Philip Vogel & Co.
Sales Range: $2—3Mil Employees: 75
*Also DIRECTORS
PRODUCTS: Men's sportswear, neckwear, knives.
S.I.C. 2321; 2323

SWEET MFG. CO.
(Subs. Consolitated Jewelry Co.)
Gilbert St., West Mansfield, Mass. 02052
Tel. 617-239-2961
[illegible] Sales: William R. Armstrong, Jr.
V-P (Mfg)—Frank W. Eddles[illegible]
PRODUCTS: Chain for jewelry purposes.
S.I.C. 3915

MARTIN SWEETS COMPANY, INC.
3131 W. Market St., Louisville, Ky. 40212
Tel. 502-774-5786
*Chrm & Pres—Martin Sweets
*Exec V-P—J. A. Hanns
Purch Agt—Jack Bowyer
Chief Design Engr—Ted Ploetner
Prod Engr—J. C. Ward
Accts—Coopers & Lybrand, Louisville, Ky.
Sales Range: $3—4Mil Employees: 80
*Also DIRECTORS—Other Directors Are:
Robinson S. Brown, Jr. Robert F. Douglass
Logan B. Neb
PRODUCTS: Designer & mfr. of process equip. and systems for urethane foams, sprayers & elastomers & specialized machines, vapor chillers, urethane saws & foam shredders
S.I.C. 3559; 3564

SWEETWATER DIVERSIFIED, INC.
200 N. Main St., Salt Lake City, Utah 84103
Tel. 801-521-9717
*Chrm & Pres—Brian C. Swinton
*V-P (Mktg)—Gordon D. Walker
*V-P (Oper)—Garry T. Brown
*V-P & Gen Coun—David L. Gillette
*Secy & Compt—Frank L. Moss, Jr.
Sales Mgr—Larry B. Hanks
Adv Mgr—Heidi S. Swinton
Group Mgr—Lane Howells
Accts—Smith, Brady, Kennard & Bushman, Salt Lake City, Utah
Sales: $4Mil Employees: 25—125 Seasonal
*Also DIRECTORS—Other Directors Are:
David E. Adams C. Ross Anderson
Gary H. Brockbank Barry N. Ingham
William B. Smart
BUSINESS: Recreational equity ownership resort operation; lot sales; equity time sharing; condominiums, residential real estate
S.I.C. 6512; 6519; 6552

JOHN SWENSON GRANITE CO.
Concord, N. H. 03301
Tel. 603-225-27[illegible]
*Chrm & Pres—Kneeland Swenson
*Exec V-P—Kurt M. Swenson
*Secy—Kevin C. Swenson
Gen Mgr—Gerald J. Paquette
Prod Mgr—Thomas Fenderson
Accts—N. [illegible]arlow, Manchester, N. H.
Sales: $1Mil Employees: 50
*Also DIRECTORS—Other Directors[illegible]
James S. Barker Guy Swenson, Jr.
Robert N. Ei[illegible]
PRODUCTS: Rough blocks, monumental & building, hwy curb
S.I.C. 3281

V. H. SWENSON COMPANY, INC.
514 Elm St., Kearny, N. J. 07032
Tel. 201-991-5733
*Pres—Victor H. Swenson, Jr.
*Exec V-P & Treas—Gertrude F. Swenson
Accts—Koppelman & Eglow, South Orange, N. J.
Sales: $1Mil
*Also DIRECTORS—Other Directors Are:
Willard R. Nevart
PRODUCTS: Custom molding of thermoplastic materials
S.I.C. 3079

SWEPCO TUBE CORP.
1 Clifton Blvd., Clifton, N. J. 07011
Tel. 201-778-3000
*Pres—Paul A. Tobelmann
*Exec V-P—A. Jack Ridella
*Treas—Paul F. Kelly
*Secy—William G. Warden, III
Cont—L. V. McCabe
Sales Mgrs—Carrol J. Nanny; Harold Oerffnkel
Pit Supt—T. McGrath
Chief Engr—James A. Seme
Purch Agt—Alfred Ridella
Prod Mgr—Ernie DeDevia
Employees: 150
*Also DIRECTORS
PRODUCTS: Corrosion resistant pipe, tubing & fittings
S.I.C. 3331; 3391; 3356; 3494

SWETT & CRAWFORD
(A Unionamerica Co.)
4201 Wilshire Blvd., Los Angeles, Cal. 90010
Tel. 213-937-5411
*Chrm & Chief Exec Officer—John C. Spencer
*Pres—Thomas Carey
*Exec V-P—Kenneth William Woods
Sr V-P—William Warren
Sr V-P—Lolita Cramer
V-P—C. L. Norman
V-P—Edwin V. Hughes
V-P—H. D. Heller
V-P—A. C. Spencer
—Donald W. Munson
James M. McGrath
[illegible] Employees 350

Exhibit B — Standard and Poors Register, 1976, Vol. 1; Moody's Industrial Manual, 1975, Vol. 2 and Directory of Corporate Affiliations, 1976 attached to Sevor Affidavit.

However debentures may be redeemed after May 31, 1971 and prior to Dec. 1, 1985 as a whole at 105 in case of merger or consolidation with a corporation having total assets equal to at least 50% of company's total assets.

Also callable on like notice for sinking fund (which see) at 100.

SINKING FUND—Annually and cumulative, before each Dec. 1, 1966-85, cash (or debentures) equal to $500,000 from consolidated net income in excess of $1,000,000, to redeem debentures at par, plus similar optional payments.

Company may receive credit up to $500,000 for any contingent sinking fund payment for previously outstanding debentures which during 12 months preceding date of such contingent sinking fund payment have been delivered by company to trustee, redeemed (otherwise than through contingent or optional sinking funds) or converted into common prior to being called for redemption through contingent or optional sinking funds. Moneys deposited for redemption of any debentures converted subsequent to calling of such debentures for redemption shall be repaid to company.

CONVERTIBLE—Into common after Nov. 30, 1965 to Dec. 1, 1985 incl., if called after Nov. 30, 1965 until but not after 6th business day prior to redemption date) at $25 a share; no adjustment made for interest or dividends; scrip or cash paid in lieu of fractional shares. Conversion privilege protected against dilution; no adjustment required on issuance of up to 20,000 common shares pursuant to stock options.

WARRANTS—Co. called all outstanding warrants for redemption at $1 per share on Sept. 6, 1967; warrants were exercisable into common shares at $25 per share. Holders of warrants for 21 shares or more were offered privilege of exchanging their warrants for shares of common stock at rate of 1 share of common stock for warrants for an aggregate of 21 shares of common stock until close of business Aug 25, 1967.

SECURITY—Not secured; subordinated to senior debt.

CREATION OF ADDITIONAL DEBT—Company may not incur funded debt unless thereafter (1), (2) and(3) under dividend restriction below are satisfied.

DIVIDEND RESTRICTIONS—Company may not pay cash dividends on common or acquire stock (except though 4.8% first preferred sinking fund, unless thereafter, on consolidated basis (1) net working capital equals at least $2,500,000; (2) earned surplus equals at least $2,000,000; (3) sum of capital, capital surplus and earned surplus equal at least $10,000,000.

RIGHTS ON DEFAULT—Trustee or 25% of debentures may declare principal due and payable (20 days' grace for payment of interest; 60 days for sinking fund installment).

INDENTURE MODIFICATION—Indenture may be modified, except as provided, with consent of 66⅔% of debentures.

PURPOSE—Proceeds for construction, new equipment, and working capital.

LEGAL—For savings banks in Me.

OFFERED—Of $10,000,000 5¼% offered to stockholders, $3,934,300 were subscribed through exercise of rights which expired Dec. 1, 1960. Remaining $4,065,700 debentures were purchased by underwriters headed by Coffin & Burr, Inc., Boston, and sold publicly at subscription price, 98.63%.

PRICE RANGE—	1974	1973	1972	1971	1970
High	74	87	89	80	71
Low	64	68	71	65	50

2. Keyes Fibre Co. convertible subordinated debentures 5s due 1982:

Rating—Ba

AUTH.—$6,000,000; outstg., Dec. 31, 1974, $6,000,000.

DATED—Aug. 15, 1967. DUE—Aug. 15, 1982.

INTEREST—F&A15 at office of trustee to holders registered 15th day prior to interest date.

TRUSTEE—Chemical Bank, New York.

DENOMINATION — Fully registered, $1,000 and authorized multiples thereof.

CALLABLE—As a whole or in part on at least 30 days' notice to each Aug. 14, incl., as follows:

1974	103.76	1975	103.55	1976	103.34
1977	103.13	1978	102.92	1979	102.71
1980	102.51	1981	102.30	1982	102.09
1983	101.88	1984	101.67	1985	101.46
1986	101.26	1987	101.05	1988	100.84
1989	100.63	1990	100.42	1991	100.21
1992	100.00				

However debs. may be redeemed after Feb. 15, 1968 and prior to Aug. 15, 1970 at 105 as a whole in case of merger or consolidation with a corporation having total assets equal to at least 80% of Co.'s total assets. Also callable for sinking fund (which see) at par.

SINKING FUND—Annually, to retire debs. at par each Aug. 15, 1973-81, cash (or debs.) equal to 5% of debs. outstg. Aug. 15, 1977 plus similar optional payments.

SECURITY—Not secured; subordinated to all senior debt.

CONVERTIBLE—Into com. at any time (if called, on or before 5th business day prior to redemption date) at $25 a sh. No adjustment for interest or divs. except that debs. converted after record date and prior to interest payment date must be accompanied by an amount equal to such interest to which the registered holder is entitled to receive. Cash paid in lieu of fractional shs. Conversion privilege protected against dilution.

DIVIDEND RESTRICTION—Co. may not pay cash divs. on or acquire capital stock in excess of consolidated net income after Dec. 31, 1968 plus net proceeds from sale of stock or debt converted to stock after such plus $2,000,000.

PURPOSE—Proceeds for general purposes.

OFFERED—($6,000,000) at 100 (proceeds to Co., 98) on Aug. 22, 1967 thru Dominick & Dominick, Inc., and associates.

PRICE RANGE—	1974	1973	1972	1971	1970
High	63	84	87	77	90
Low	50	55	67	63	50

3. Other Long Term Debt: Outstanding Dec. 31, 1974, $18,520,000 comprised of:

(1) $1,000,000 9¼% notes payable under revolving credit agreement (see further details below).

(2) $14,520,000 5¼% and 5¾% notes payable to several insurance companies, due Oct. 1, 1989.

(3) $3,000,000 8¾% notes payable to two insurance companies, due Aug. 1, 1989; final maturity may be extended to 1993 with consent of then holders.

In 1973 Co. entered into a revolving credit and long-term loan agreement with two domestic banks and simultaneously terminated a similar 1971 agreement with same banks. Until August 1978 Co. may borrow and prepay on 90 day renewable notes at banks' base rate of interest amounts up to $3,000,000. In Aug. 1975 amount outstanding is to be converted into a five year term loan at ascending interest rates of from ½% to 1% above banks' base rate. Increasing annual principal payments from $400,000 in 1976 to $800,000 in 1980 are required.

Among other restrictive covenants, Co.'s various loan agreements and indentures limit payment of dividends on common stock. At Dec. 31, 1974, amount of retained earnings free of most restrictive limitation was approximately $1,643,000.

Capital Stock: 1. Keyes Fibre Co. common; par $1:

AUTHORIZED—4,000,000 shares, outstanding, Dec. 31, 1974, 1,816,211 shares; in treasury, 14,932 shares; reserved for options, 100,000 shares; par $1.

On Feb. 1, 1975 William Gordon Corp. owned 183,572 shares (10%).

DIVIDEND RESTRICTION—See Long Term Debt, above.

VOTING RIGHTS—Has one vote per share.

PREEMPTIVE RIGHTS—None.

DIVIDENDS PAID—

1950	$1.50	1951	$1.86	1953-54	$2.00
[1]1955	1.35	[1]1956-59	1.20	[1]'60-62	0.84
[1]1963	0.90	[1]1964	0.68	[1]'65	0.84
1966	0.76	1967-73	0.90	1974	0.97½
[1]1975	0.25				

[1]Also stock dividends: 1950, 2%; Dec. 28, 1953, 100%, 1960 to 1965, 2%.

[2]Also paid 100% stock dividend Apr. 15, 1955. Cash dividend of 50 cents paid prior to stock dividend.

[3]To Mar. 3.

TRADED—OTC.

PRICE RANGE—	1974	1973	1972	1971	1970
High	14½	18⅞	20⅞	20	17½
Low	8⅛	10⅛	14½	12¾	10⅝

Transfer Agents: The First National Bank, Boston; Maine National Bank, Portland, Me.

Registrars: National Shawmut Bank, Boston; Canal National Bank, Portland, Me.

LITTON INDUSTRIES, INC. /

History: Incorporated in Delaware Nov. 3, 1953 as Electro Dynamics Corp.; present name adopted Aug. 16, 1954.

For acquisitions, etc., prior to 1970, see Moody's 1974 Industrial Manual.

In Mar. 1970, acquired Xcel Mold & Machine Co. for 31,636 common shares.

Also in Mar., 1970, acquired a German producer of disposable medical products.

In Apr 1970, acquired Checkmaster, Inc. for 27,400 common shares.

Also in Apr. 1970, acquired a Holland manufacturer-distributor of lung equipment.

In June 1970, acquired Valentine Pulp and Paper, Louisiana producer of pulp from bagasse; Digital Data Systems, Texas manufacturer of electrical instrumentation products for geophysics and Liberty Copper and Wire Co., Illinois manufacturer of magnet and transformer wire.

In June 1971 acquired low power glass traveling wave tube product line, together with certain related property and assets from Microwave Associates (West) Inc.

In Jan., 1973, Co. sold the major operating units of its power transmission division to Jeffrey Galion, Inc. The units include: Foote & Jones industrial gear operations, Chicago; Whitney Chain, Hartford; Electro motors operations, Anaheim, Cal. and Ashland, Va., and Litton power transmission, Toronto.

In March, 1973, Co. sold 3 Stouffer food products and services divisions to Nestle Allmentana S.A.

Divestiture of Operations: During year ending July 31, 1973, Co. disposed of following businesses: food operations of Stouffer Corp. and its subsidiaries, certain portions of its industrial products group, its Great Lakes bulk cargo vessels, its medical supply business, part of its aerial resource exploration operations and two other lesser products lines. In addition to these activities Co. determined to discontinue operations of its Great Lakes shipbuilding facility, one of its revenue systems divisions, its refrigeration equipment business and one of its printing operations.

During year ended July 31, 1973, Co. disposed of its engineering and construction business.

On Apr. 26, 1974 sold Eureka Specialty Printing Co.

In Oct. 1974, sold Reinhold Publishing Co.

In fiscal 1974, Co. determined to cease operations at its industrial rubber products facilities and to phase out production of electromechanical products of business systems and equipment operations.

Business: Co. manufactures and services business and office machines and equipment including typewriters, copy machines, electronic display, printing and programmable electronic calculators, special purpose computers, automated business systems. Other products and services include paper for printing and special uses, printing of business and accounting forms, design and planning services for offices, commercial centers and retail stores.

Co. also manufactures electronic and specialized systems and equipment primarily for United States and other governments. Major programs and products include: development and manufacture of inertial navigation systems; digital data processing systems; mission control systems; and development and manufacture of micro-electronic digital data converting equipment and communication systems.

Co. manufactures and installs materials handling systems and equipmeat, and manufactures machine tools and electronic and mechanical components for industrial applications; produces a variety of specialized equipment for professional and other uses, such as medical electronic instrumentation, medical x-ray equipment, services and optical surgical equipment, electronic and microwave cooking equipment. Co. also conducts marine seismic exploration and geophysical research and exploration; and publishes textbooks and various professional and trade publications.

Sales and Service Revenues by Product Group (in $000):	1974	1973
Business sys. & equip.	1,065,495	936,148
Defense & marine sys.	896,311	583,813
Indust. sys. & equip.	649,886	558,135
Professional ser. & equip	443,305	364,371
Intergroup eliminations	dr24,322	dr24,144
Total	3,029,873	2,418,313

Properties: Co. owns executive offices located in Beverly Hills, Cal. Co.'s principal plants, offices and commercial centers have an aggregate floor space of approx. 22,447,000 sq. ft. of which 15,562,000 sq. ft. are located in the U. S., 1,196,000 sq. ft. are located in Canada and 5,689,000 sq. ft. in Western Europe (Germany, Italy, Netherlands, Sweden, Switzerland, France and England).

Co.'s principal plants in the U. S. are located in 73 cities in 25 states including Cal., Pa., Conn., Miss., Ill., New York, and Mass.

Subsidiaries (wholly owned, except as noted):

Adlerwerke, Vormals Heinrich Kleyer A. G. (Germany) (92.06%)
Litton Business Equipment Holdings, Ltd. (Australia)
Landis Tool Co.
Litton Business Systems, Inc. (N. Y.)
Litton Educational Publishing, Inc. (N. Y.)
Litton Industrial Products Inc.
Litton Industries Credit Corp.
Litton Industries International, N.V. (Holland)
Litton Industries Leasing Corp. (Del.)
Litton International, S. A. (Switzerland)
Litton Medical Products, Inc. (Del.)
Litton Systems, Inc (Del.)
Litton Systems (Canada) Ltd. (Canada)
Litton World Trade Corp. (Panama)
Svenska Dataregister A.B. (Sweden)
Triumph Werke Nurnmberg A. G. (Germany) 98.4%)
Western Geophysical Co. of Amer. (Del.)

Company has numerous additional subsidiaries which in the aggregate do not constitute a significant subsidiary.

MOODY'S INDUSTRIAL MANUAL
1975 VOL. 2

Exhibit B – Standard and Poors Register, 1976, Vol. 1; Moody's Industrial Manual, 1975, Vol. 2 and Directory of Corporate Affiliations, 1976 attached to Sevor Affidavit.

Officers

C. B. Thornton, Chairman
F. W. O'Green, President
Glen McDaniel, Chmn. Exec. Comm.
J. S. Imirie, Exec. Vice-Pres.
R. H. O'srien, Exec. Vice-Pres.

Senior Vice-Presidents

J. T. Casey	N. J. Marandino
B. A. Gustafson	J. R. Mellor
C. M. Kelly	L. T. Smith
A. R. Kaufman	G. E. Weers

Vice-Presidents

N. A. Begovich	R. F. Kane
C. S. Bridge	R. H. Lentz
R. I. Bruder	P. J. Lynn
P. E. Brunton	J. H. Martin
J. F. Caliguiri	D. K. Mutchler
J. P. Francini	J. S. Oppenheim
J. D. Freitas	A. B. Owen
C. A. Gallagher	B. B. Strange
John Grado, Jr.	

G. W. Fenimore, Vice-Pres. & Secretary
C. H. Black, Treasurer
W. L. Grosvenor, Controller

Directors

C. B. Thornton	Henry Salvatori
Glenn McDaniel	Fred W. O'Green
J. A. Thomas	Vernon Stouffer
M. A. Hollengreen	J. B. Spain
J.O. Wright	N. H. Topping
R. M. Cook	D. G. Mitchell

Annual Meeting: 2nd Saturday in Dec.

General Counsel: R. H. Lentz.

Auditors: Touche Ross & Co.

No. of Stockholders: July 31, 1974: Preferred Ser. A, 2,963; ser. B, 3,000; preference, 21,676; common, 126,891.

No. of Employees: July 31, 1974, 105,500.

Office: 360 North Crescent Drive, Beverly Hills, Cal. 90210.

Consolidated Income Account, years ended July 31 (from SEC report—$000 omitted):

	1974	①1973
①Sales & services	3,029,573	2,418,343
Cost of sales	2,272,836	1,746,938
Sell., etc., exp.	534,330	473,151
Deprec.	69,737	67,169
Interest	68,640	47,399
Other deduct.	①77,219	
Income taxes	31,906	46,027
Inc. contin. op.	d14,715	$1.10
Earn., com. sh.	d$0.60	
Discont., oper.:		
Oper. loss	14,451	4,512
Dispos. inc.	dr10,640	1,445
Net income	d39,806	43,030
Prev. ret. earn.	356,581	328,188
Pref. divs.	5,952	6,012
Com. divs. (stk.)	7,476	8,895
Retained earn.	303,347	356,581
Times chgs. earn.:		
Before inc. tax	------	2.70
After inc. tax	------	1.91
②Earn., com. sh.	d$1.23	$1.02

①From continuing oper. ②Prov. for prod. chges. ③On 34,554,944 (1973, 34,196,852) aver. com. & pref. shs. ④Restated to show discont. oper. as a separate item.

Yr. End Shs.:	1974	1973
Com.	30,568,065	32,009,566

Consolidated Balance Sheet, as of July 31 (SEC report—$000 omitted):

	1974	1973
Assets:		
Cash, etc.	70,844	85,654
Receivables	741,618	659,681
①Inventories	687,471	680,900
Prepays.	15,078	14,422
Total current	1,515,009	1,442,657
②Net prop., etc.	481,496	490,191
③Invest. cost	96,963	86,901
Other assets	11,962	13,005
Exc. acq. cost	108,908	113,427
Total	2,214,354	2,116,181
Liabilities:		
Notes, etc., pay.	241,444	240,662
Accts. pay.	322,361	341,309
Accruals	105,551	95,434
Income taxes	5,267	10,925
Total current	734,623	679,330
Conv. sub. debs.	82,218	87,518
Oth. lg. tm. debt	530,586	507,281
Def. contr., etc.	31,290	29,569
Def. inc. taxes	37,330	36,091
Pref. stk. ($2.50)	4,711	5,267
$3 pfd. A stk. ($5)	$16	$16
$3 pfd. B stk. ($5)	14,403	14,403
Com. stock ($1)	33,153	33,126
Paid-in surp.	434,949	436,271
Retained earn.	303,347	356,581
Stkhld. equity	791,870	846,104
④Reacq. stk.	23,071	9,948
Net stkhld. eq.	768,807	836,156
Total	2,214,354	2,116,181
Net curr. assets	780,386	763,327
⑤Depreciation	278,349	247,810

①Lower cost or mkt., less $341,830,000 (1973, $[illegible]) adj. to unconsol. finance subs. (②1973, $40,297,000) adj. in unconsol. finance subs. (③Com. shs. at cost: 1974, 2,594,008; 1973, 1,116,200.

Long Term Debt: 1. Senior Debt: Outstanding, July 31, 1974, $468,946,000 comprised of:

(1) $45,625,000 notes payable to insurance companies, due to 1994, with interest from 8½% to 4½%.

(2) $9,450,000 notes payable to insurance companies, due to 1993, with interest from 8.35% to 7%.

(3) $16,541,000 notes payable to banks due 1976 to 1982 with interest at 7½% to 8% (payable in Dutch guilders).

(4) $155,543,000 notes payable to banks, due to 1977, with interest at ¼% to ⅝% above prime rate.

(5) $83,095,000 notes payable to banks, due 1977 to 1980 with interest at 6½% to 6¾% (payable in Swiss francs).

(6) $20,000,000 bonds payable to 1994 with interest at 6¾% (payable in Swiss francs).

(7) $13,712,000 miscellaneous debt (including subsidiary debt below), due to 1994 with average interest at 6% and 5%.

2. Litton Industries, Inc. 8¼% notes due 1976:

Rating—Baa

AUTHORIZED—$60,000,000; outstanding, July 31, 1974, $60,000,000.
DATED—Dec. 1, 1970. DUE—Dec. 1, 1976.
INTEREST—J&D1 to holders registered on 15th day prior to interest date.
TRUSTEE—Chemical Bank, NYC.
DENOMINATION—Fully registered, $1,000 and authorized multiples thereof.
CALLABLE—As a whole or in part, on or after June 1, 1976, on at least 30 days' notice, at par.
SECURITY—Not secured. Co. or any restricted subsidiary may not incur secured debt without securing notes equally except for mtges. on after acquired or constructed property to secure payment therefor; encumbrances on property acquired after Dec. 1, 1970 and existing on date of acquisition, encumbrances on property, stock or debt of a corporation at time it becomes a restricted subsidiary; encumbrances on property of corporations merged with Co. or restricted subsidiary and those mtges. resulting from conditional sales or created to extend, renew or refund secured debt; existing secured debt or secured debt assumed at time corporation becomes restricted subsidiary; liens upon funds advanced in connection with government contracts; secured debt owed by a restricted subsidiary; and otherwise prohibited secured debt which does not exceed 5% of consolidated net tangible assets. Co. may not consolidate or merge without securing debs. equally.
CREATION OF ADDITIONAL DEBT—Co. may not create any additional funded debt unless consolidated net tangible assets thereafter are at least 220% of consolidated funded debt.
SALE & LEASEBACK—Co. may not sell and lease back property other than leases for not more than 3 years or a sale and leaseback between a restricted subsidiary and Co. or between restricted subsidiaries.
DIVIDEND RESTRICTION—Co. may not pay cash divs. on or acquire capital stock in excess of consolidated net income after July 31, 1970 plus $35,000,000 plus net proceeds from sale of stock or debt converted into stock after July 31, 1970.
INDENTURE MODIFICATION—Indenture may be modified, except as provided, with consent of 66⅔% of debs. outstg.
LISTED—On New York Stock Exchange.
PURPOSE—Proceeds for general funds.
OFFERED—($60,000,000) at 100 plus accrued interest on Dec. 15, 1970 thru Lehman Brothers, Inc. and Clark, Dodge & Co., Inc. & Associates.

PRICE RANGE—	1974	1973	1972	1971
High	100½	104	105¼	104¼
Low	87⅛	82	98	100

3. Litton Industries, Inc. convertible subordinated debenture 5¼s due 1974:
OUTSTANDING — July 31, 1974, $600,000; held privately.
MATURITY—Dec. 1, 1974.
INTEREST—J&D1.
CALLABLE—On or after Dec. 1, 1961 at 103 to Nov. 30, 1962; reduced prices thereafter to 100 after Nov. 30, 1971; for sinking fund at 100.
SINKING FUND—Cash (or debentures) to redeem at par, each Dec. 1, 1965-74, 10% of maximum debentures at any time outstanding.
CONVERTIBLE—Into common on or before maturity or redemption, date at $20 per share.
SECURITY—Not secured; subordinated to existing debt and to future debt w/ a limited exceptions.

4. Litton Industries, Inc., convertible subordinated debenture 3½s, due 1987:

Rating—Ba

OUTSTANDING—July 31, 1974, $27,310,000.
DATED—Apr. 1, 1962.
MATURITY—Apr. 1, 1987.
Apr. 9, 1962.
TRUSTEE—Chase Manhattan Bank, New York.
DENOMINATION—Coupon, $100, $500, $1,000, and approved multiples of $1,000; registerable as to principal; fully registered, $500, $1,000 and any multiples of $1,000. C & R and denominations, interchangeable (except in denominations of $500 or more may not be exchanged for denominations of less than $1,000).
CALLABLE—As a whole or in part on at least 30 days' notice at any time at 100.
Also callable on like notice at 100 for sinking fund (which see).
SINKING FUND—Each Apr. 1, 1973-86, cash (or debentures) to retire 119,000 debentures at par, plus similar optional amounts each Apr. 1, 1967-86. Credit may be taken for debentures converted or otherwise acquired.
CONVERTIBLE—Into common, to maturity (if called, on or before 15th day prior to redemption date) at $42.50 a share to Apr. 1, 1982; $47.50 thereafter to Apr. 1, 1932; and $53 thereafter; no adjustments for interest or dividends; Cash paid in lieu of fractional shares. Conversion privilege protected against dilution; no adjustment required for shares issued for options, conversion of securities outstanding Apr. 1, 1972, or stock dividends not exceeding 3% in any one year.
DIVIDEND RESTRICTIONS—Company may not pay cash dividends on or acquire common stock in excess of consolidated net income after July 31, 1961 plus $20,000,000 and net proceeds from sale after Apr. 1, 1962 of stock and of debt converted into stock.
RIGHTS ON DEFAULT—Trustee or 25% or debentures may declare principal due and payable (30 days' grace for payment of interest).
INDENTURE MODIFICATION — Indenture may be modified, except as provided, with consent of 66⅔% of debentures.
LISTED—In New York Stock Exchange.
PURPOSE—$50,748,200 to retire debt and for general funds; $11,306,000 as partial consideration for acquired companies; $3,963,000 to private investors.
OFFERED — ($59,749,200) to stockholders through exercise of rights which expired Apr. 9, 1962. Lehman Brothers and Clark, Dodge & Co., New York, headed underwriters ($11,263,000 as partial payment for acquired companies and $3,963,000 to private investor).

PRICE RANGE—	1974	1973	1972	1971	1970
High	49	58	68	89	101
Low	33⅛	44	52½	65⅛	52½

Subsidiary Debt: 5. Louis Allis Co. debenture 4¼s, 1976:
AUTHORIZED—$3,000,000; outstanding, July 31, 1973, $581,000.
DATED—July 1, 1956.
MATURITY—July 1, 1976.
INTEREST—J&J1 at Marine National Exchange Bank, Milwaukee.
TRUSTEE—Marine National Exchange Bank of Milwaukee.
DENOMINATION—Coupon, $1,000; registerable as to principal; fully registered, $1,000 and multiples. C & R interchangeable with $2 service charge.
CALLABLE—As a whole or in part on at least 30 days' notice at any time to June 30 incl. as follows:

1975	103½	1976	100

Also callable on like for sinking fund (which see) on each July 1 at 100.
SINKING FUND—Annually, cash to redeem debentures on July 1 as follows: $175,000, 1965-70; $200,000, 1971-75; optional payments may also be made equal to above mandatory requirements on each July 1, 1960-75. Mandatory requirements may be satisfied by redemption of debentures at 100, by surrender of purchased debentures at 100 or by credits for not exceeding $300,000 debentures previously redeemed otherwise than by mandatory sinking fund provisions.
SECURITY—Not secured.
ASSUMED—Upon merger of Louis Allis Co. in Feb. 1967.
RIGHTS ON DEFAULT—In event of default (30 day grace period for interest payment), trustee or 10% of debentures may declare principal due and payable.
INDENTURE MODIFICATION — Indenture may be modified, except as provided, with consent of 66⅔% of debentures.

6. Louis Allis Co. Sinking Fund Debentures 5½s, due 1985:

Rating—Baa

AUTHORIZED—$3,000,000; outstanding, July 31, 1973, $1,142,000.
DATED—Dec. 1, 1965. DUE—Dec. 1, 1985.
INTEREST—J&D 1 to registered holders.
TRUSTEE—Marine National Exchange Bank, Milwaukee, Wis.
DENOMINATION—Fully registered, $1,000 and authorized multiples thereof.
CALLABLE—As a whole or in part at any time on at least 30 days' notice to each Nov. 30 incl. as follows:

1975	102.20	1976	101.80	1977	101.56
1978	101.34	1979	101.13	1980	100.94
[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]

Not callable, however, before Dec. 1, 1979 from funds borrowed at interest rate below 5½%.

Exhibit B — Standard and Poors Register, 1976, Vol. 1; Moody's Industrial Manual, 1975, Vol. 2 and Directory of Corporate Affiliations, 1976 attached to Sevor Affidavit.

Also, redeem like notice at 100 for sinking fund (with acc).
SINKING FUND—Cash (or debs.) to retire debs. at par each Dec. 1 as follows: 1971-76, $1,000,000; 1977-84, $1,500,000; Dec. 1, 1985, $500,000. Optional payments may also be made equal to above mandatory requirements on each Dec. 1, beginning 1971.
SECURITY—Not secured.
ASSUMED—Upon merger of Louis Allis Co. in Feb. 1967.
RIGHTS ON DEFAULT—Trustee of 10% of debs. may declare principal due and payable (20 days' grace for interest payment).
INDENTURE MODIFICATION—Indenture may be modified, except as provided, with consent of 66⅔% of debs.

7. Other Subordinated Subsidiary Debt: Outstanding, July 31, 1974, $25,000,000 6¾% due June 26, 1977 (payable in Swiss Francs).

Capital Stock: 1. Litton Industries, Inc. $3 cumulative convertible preferred, series A; par $5:
AUTH.—All series, 22,000,000 shs.; outstg., series A, July 31, 1974, 103,292 shs.; par $5.
PREFERENCES—Has preference for assets and divs.
DIVIDEND RIGHTS—Entitled to cum. divs. of $3 a sh. annually, payable semi-annually 1/2-15.
DIVIDENDS PAID—Initial div. of $1.37½ paid July 15, 1964. Regular semiannual $1.50 payments thereafter.
VOTING RIGHTS—Has one vote per sh.; or default or equivalent of 6 quarterly divs. on pfd. of all series, number of directors will be increased by two and pfd. will be entitled to elect such additional two directors.
Consent of 66⅔% of pfd. required to authorize prior stock; change terms adversely or purchase or redeem less than all pfd., unless all dividends thereon have been paid; however no such consent is required (1) if, at or prior to taking effect of any of above actions, provision is made to retire all pfd. and (2) in connection with increase in authorized com. or pfd.; issuance of parity stock or fixing of any particulars of shs. of other pfd. series that may be fixed by directors with respect to shs. of such other pfd. series.
LIQUIDATION RIGHTS—On liquidation, entitled to $50 a sh. plus divs.
CALLABLE—As a whole or in part at any time on or after Apr. 1, 1972 on at least 30 days' notice at $100 a sh. plus divs.
PREEMPTIVE RIGHTS—None.
CONVERTIBLE—Into 2 com. shs. for each pref. sh. at any time (if called, on or before 3rd day preceding redemption date), cash paid in lieu of fractional shs. Conversion privilege protected against dilution (except for stock dividends of less than 3% aggregate annually). Com. may be issued to pfd. holders instead of adjusting conversion rate.
PURPOSE—Issued (428,141 shs.) Feb. 10, 1964 in exchange for common on a share-for-share basis.
TRANSFER AGENT—Litton Industries, Inc. Shareholder Services, P. O. Box 5555, Beverly Hills, Calif. 90210.
REGISTRAR—Wells Fargo Bank, N.A., Los Angeles.
DIVIDEND DISBURSING AGENT—Company.
LISTED—On NYSE (Symbol: LIT Pr Cv); also listed on Pacific Stock Exchange.

PRICE RANGE—	1974	1973	1972	1971	1970
High	56	41	63⅛	74¼	88
Low	20⅛	30	37	50	42

2. Litton Industries, Inc. $2 cumulative preferred, series B; par $5:
AUTH.—All series, 22,000,000 shs.; outstg., series B, July 31, 1974, 2,880,600 shs.; par $5.
PREFERENCES—Has equal preference with other series outstg. as to assets and divs.
DIVIDEND RIGHTS—Entitled to cum. cash divs. of $2 annually, payable quarterly, Apr. 1, etc.
LIQUIDATION RIGHTS—In any liquidation, entitled to $25 a sh. plus divs.
CALLABLE—As a whole or in part on or after Jan. 15, 1978 at $50 a sh. plus divs.
CONVERTIBLE—Into com. (0.14331 com. shs. for each pfd. sh. to July 31, 1974). Note: Effective Sept. 19, 1974, Ser. B pfd. is no longer convertible into common stock.
OTHER PROVISIONS—Same as ser. A $3 cum. conv. pfd.
LISTED—On NYSE (Symbol: LIT Pr B); also listed on Pacific Stock Exchange.
PURPOSE—Issued in acquisition of Landis Tool Co. in Dec. 1967, (932,679 shs.).

PRICE RANGE—	1974	1973	1972	1971	1970
High	19⅜	21⅜	28⅜	31¾	32
Low	10	17⅛	17½	24¼	21¾

3. Litton Industries, Inc., convertible preference stock, participating series, par $2.50:
AUTHORIZED—8,000,000 shares; outstanding, this series, July 31, 1974, 1,834,534 shs.; in treasury, 36,702 shs.; par $2.50.
PREFERENCES—Has preference, on a parity with series A and B, as to assets.
DIVIDEND RIGHTS—Entitled to cash divs. (when and if cash divs. are declared on common) at a rate equal to div. declared on each common sh. multiplied by number of common shs. into which each pref. sh. is then convertible. Such dividend shall not be cumulative and shall be paid at same time as dividends on common are paid.
VOTING RIGHTS—Has one vote per sh. and votes as one class with pfd. and com., except that, on default of 6 quarterly divs. or 3 semi-annual divs., the number of directors shall be increased by two and pref. has exclusive right, voting as a class, so long as such default continues, to elect such two additional directors, but is not entitled to participate with com. in election of other directors.
Consent of 66⅔% of pref. required to authorize prior stock; change terms hereof adversely; or purchase or redeem less than all pfd. and pref. stock unless all divs. thereon have been paid.
LIQUIDATION RIGHTS—On any liquidation entitled to receive, before com. and on a parity with pfd., $25 a sh. plus divs. accrued and unpaid.
PREEMPTIVE RIGHTS—None.
CALLABLE—As a whole at any time after Jan. 31, 1976 on at least 30 days' notice to Dec. 31 incl. of following years at prices per sh. indicated:

1976	$87.75	1977	$69.97	1978	$72.20	
1979	74.43	1980	76.65	1981	78.87	
1982	81.47	1983	84.07	1984	86.67	
1985	89.27	1986	91.87	1987	94.90	
1988	97.92	[1]	100.95			

[1] After Dec. 31, 1988.
Callable, however, before Feb. 1, 1976 at partial redemption price (see below) if Co. recapitalizes, merges, consolidates or voluntarily sells substantially all its property and assets to any other corporation for cash or stock (or both) of such other corporation.
Optional Partial Redemption: Co. may, each calendar year beginning 1967, redeem shs. of participating series by offering holders on 1st business day of Jan. in such year, the right to call upon the Co. until last business day of Jan. in any such year to redeem up to 3% of shs. held, at following optional redemption price per sh.:

1973	62.05	1974	63.95	1975	65.85	
1976 & after	[1]					

[1] Same prices as shown above for total redemption.
Notice of such offer must be given at least 15 days' prior to Jan. 31 in such year and must specify maximum number of shs. to be redeemed, applicable optional redemption price, place of redemption and expiration date of such offer.
CONVERTIBLE—Into common at any time (in case of redemption of all shs. of participating series, on or before 3rd day preceding redemption date) in following amounts of common shs. for each sh. of participating series during calendar years shown:

1972	1.2005	1973	1.2376	1974	1.2758	
1975	1.3153	1976	1.3559	1977	1.3978	
1978	1.4411	1979	1.4857	1980	1.5316	
1981	1.5790	1982	1.6279	1983	1.6781	
1984	1.7301	1985	1.7835	1986	1.8386	
1987	1.8954	1988	1.9539	[1]	2.0145	

[1] 1989 and thereafter.
In lieu of fractional shs., cash equal to same fraction of market value of a full com. sh.
Conversion rates are subject to following adjustments:
(a) In the event com. dividends on any calendar year exceed 2½% of total com. shs. outstanding, the conversion rates in effect for balance of such calendar year and thereafter shall be adjusted as follows: (1) conversion rate for such calendar year set forth in above table shall be increased by adding to it the decimal equivalent of amount of percentage of com. stock dividend requiring adjustment that is in excess of 2½%; (2) conversion rate in above table for calendar year following the year for which the adjusted conversion rate has been determined shall be increased to product obtained by multiplying (x) the adjusted conversion rate by (y) the quotient resulting from the division of the unadjusted conversion rate for such calendar year as shown in above table by the unadjusted conversion rate for previous calendar year as shown in such table; (3) conversion rate for each calendar year thereafter set forth in above table shall be increased to product obtained by multiplying (x) the newly adjusted conversion rate of previous calendar year determined in accordance with formula set forth in (2) above by (y) the quotient resulting from the division of the unadjusted conversion rate for such calendar year as shown in such table by the unadjusted conversion rate for the previous calendar year as shown in such table; (4) all adjustments to be carried out to four decimal places.
(b) Any com. dividend in shs. of com. of 25% or more of total com. shs. outstanding shall be considered in same manner as a division of outstanding shs. of com. and an adjustment in conversion rate shall be made in accordance with provisions of (c) below with respect to subdivision of outstanding com. shs.
(c) In case Co. subdivides outstanding com. into a greater number of com. shs. or combine outstanding com. shs. into a smaller number of com. shs., the conversion rate in effect immediately prior to such subdivision or combination shall be proportionately increased or decreased, as the case may require.
(d) No adjustment of conversion rate shall be made by reason of issuance of com. stock in exchange for cash, property or service.
In case Co. is recapitalized, or is consolidated with or merged into, or substantially all property or assets is sold to, any other corporation, proper provisions shall be made whereby holder of any shs. of participating series outstanding prior to such event shall thereafter be entitled to such conversion rights, with respect to securities of the corporation resulting therefrom, as shall be substantially equivalent to conversion rights herein provided for.
TRANSFER AGENT—Litton Industries, Inc., Shareholder Services, P. O. Box 5555, Beverly Hills, Calif. 90210.
REGISTRAR—Wells Fargo Bank, N.A., Los Angeles.
PURPOSE—Issued (4,010,451 shares) under voluntary exchange offer which expired Mar. 10, 1966 and which provided for exchange as follows: Sh. for sh. for split common and at rate of two shs. of pref., participating series, for each sh. of series A pfd.
LISTED—On NYSE (Symbol: LIT Pr A); also listed on Pacific Stock Exchange.

PRICE RANGE—	1974	1973	1972	1971	1970
High	12¾	16⅛	30⅜	39¼	42⅛
Low	4⅛	7⅛	12¼	22	16¾

4. Litton Industries, Inc. common; par $1:
AUTHORIZED—120,000,000 shares; outstanding, July 31, 1974, 30,568,065 shares, reserved for conversion of debentures, 670,422 shares; reserved for conversion of preferred and preference stocks, 3,024,[illegible] shares; reserved for options outstanding, 272,751 shares; in treasury, 2,584,003 shs.; par $1.
Par changed from 10 cents to $1 in Dec. 1959 by 2-for-1 split; $1 par shares split 2-for-1, Aug. 15, 1962 and Jan. 31, 1966.
VOTING RIGHTS—Has one vote per share equally with preferred.
DIVIDENDS—1958-1974, incl., 2½% in stock.
DIVIDEND RESTRICTIONS—See long term debt above.
TRANSFER AGENT—Litton Industries, Inc., Shareholder Services, P. O. Box 5555, Beverly Hills, Calif. 90210.
REGISTRAR—Wells Fargo Bank, N.A., Los Angeles.
DIVIDEND DISBURSING AGENT—Company.
LISTED—On NYSE (Symbol: LIT); also listed on Pacific, Zurich and Amsterdam Stock Exchanges. Unlisted trading on PBW and Detroit Stock Exchanges.

PRICE RANGE—	1974	1973	1972	1971	1970
High	10¾	13½	26½	34⅜	38
Low	2⅜	6⅛	10¼	18½	15¼

NATIONAL HOME PRODUCTS, INC.

History: Incorporated in Delaware in June 1969 as Scotten, Dillon Co. to succeed a company of the same name originally incorporated in Michigan Jan. 16, 1901 (charter renewed in 1961), successor to Scotten, Dillon & Co.; present name adopted Apr. 2, 1974.
In June 1967, acquired all outstg. capital stock of Wisconsin Tobacco Co. Inc. and its wholly-owned subsidiary United Tobacco Suppliers Corp.
In June 1967, Co. also acquired for cash the physical assets and business of Lieberman Tobacco Co.
In Oct. 1969, acquired Food Packaging Inc., McComb, O.
In Sept. 1972, acquired National Home Products Inc. from Allied Chemical Corp. for approx. $4,000,000.
In Sept. 1974, acquired the institutional and commercial melamine dinnerware business of Vistron Corp., a subsidiary of Standard Oil, O., for $500,000.

Business: Manufacturer of melamine dinnerware and tobacco products, and packages of sugar products.

Properties: Plants located at Gallipolis, O., Xenia, O., Viroqua, Wisc. and Port Gibson, Miss.

Subsidiaries
Wisconsin Tobacco Co., Inc.
Scotten, Dillon Tobacco Co. Inc.
Food Packaging Inc.
Artisan Dinnerware Corp.
United Tobacco Suppliers Corp.

Officers
F. S. Berg, Pres.
Ernest Summers, Exec. Vice-Pres. & Treas.
G. J. Patterson, Jr., Vice-Pres.
D. A. Collard, Vice-Pres., Fin.
W. R. Felton, Vice-Pres., Corp. Planning
M. A. Roberson, Contr.
D. T. Cook, Sec.

Directors
F. S. Berg — G. J. Patterson, Jr.
M. U. Abraham — Ernest Summers

Auditors: Haskin & Sells.

Exhibit B – Standard and Poors Register, 1976, Vol. 1; Moody's Industrial Manual, 1975, Vol. 2 and Directory of Corporate Affiliations, 1976 attached to Sevor Affidavit.

DIRECTORY OF CORPORATE AFFILIATIONS 1976
by National Register Publishing Co., Inc.

THE LIONEL CORPORATION
9 West 57th St., New York, N. Y. 10019
Tel.: 212-371-2100
LIO—(NYSE)
Pres. & Chief Exec. Officer—Ronald D. Saypol
Treas.—Raymond M. Solaas
Sec. & Legal—George A. Padgett

Subsidiaries:
Bernardi Bros., Inc., Harrisburg, Pa.
Canadian Sterling Power Systems Div., Hamilton, Ont., Can.
Dale Electronics, Inc., Columbus, Norfolk, York, Nebr.; Yankton, S. D.
Lionel Leisure, Inc., Philadelphia, Pa.
Lionel Morsan, Inc., Paramus, N. J.
Lionel Realty Corporation, New York, N. Y.
Sterling Power Systems, Inc., Santa Ana, Calif.
Western Hydraulics, Inc., Anaheim, Calif.

Foreign Subsidiaries:
Dale Electronics Canada, Ltd., Toronto, Ont., Can.
Welwyn Canada Limited, London, Ont., Can.

LIPE-ROLLWAY CORP.
806 Emerson Ave., Syracuse, N. Y. 13201
Tel.: 315-457-6211
LIPE—(OTC)
Pres.—H. Follett Hodgkins, Jr.
Treas.—William J. Fraser
Sec.—Theodore M. Hancock

Divisions:
Dyna-Slide, East Syracuse, N. Y.
Lipe Automation Equipment, Syracuse, N. Y.
Lipe Clutch Products, Syracuse, N. Y.
Rollway Bearing Co., Liverpool, N. Y.

Subsidiary:
Lipe-Rollway Intl., Ltd., Syracuse, N. Y.

Foreign Subsidiaries:
Lipe-Rollway Ltd., Haslingden, England
Lipe-Rollway Mexicana S.A. de C.V. Mexicali, Baja California, Mexico
Lipe-Rollway Deutschland GmbH, Stolberg, West Germany

THOMAS J. LIPTON, INC.
800 Sylvan Ave., Englewood Cliffs, N. J. 07632
Tel.: 201-567-8000
Chm. Bd. & Chief Exec. Officer—W. G. Barker
Pres.—H. M. Tibbetts
Treas.—John McPeak
V. P. & Sec.—J. W. Riehm

Divisions:
Good Humor Corp., Fairfield, N. J.
Knox Celatine, Inc., Johnstown, N. Y.
Lipton Pet Foods, Inc., Woburn, Mass.
Morton House Kitchens, Inc., Nebraska City, Nebr.
Pennsylvania Dutch-Megs, Inc., Harrisburg, Pa.

LIQUIDONICS INDUSTRIES, INC.
6382 Arizona Circle, Los Angeles, Calif. 90045
Tel.: 213-670-0828
Chm. Bd. & Pres.—R. L. Huffines, Jr.
Treas. & Sec.—Rodney A. Cover

Subsidiaries:
H. O. Boehme, Inc., Plainview, N. Y.
Greer Hydraulics, Inc., Los Angeles, Calif.
Sun-Ray Burner Mfg. Corp., Plainview, N. Y.

LITTON INDUSTRIES, INC.
360 N. Crescent Dr., Beverly Hills, Calif. 90210
Tel.: 213-273-7860
LIT—(NYSE)
Chm. Bd. & Chief Exec. Officer—Charles B. Thornton
Pres.—Fred W. O'Green
Treas.—Charles H. Black
V. P. & Sec.—George W. Fenimore
V. P. & Gen. Counsel—Robert H. Lentz

Subsidiaries:
Adler Business Machines, Inc., Union, N. J.
C.R.A. Corp., Orange, N. J.
The Copper Steamship Co., Cleveland, Ohio
Cresticon, Inc., Beverly Hills, Calif.
DDS, Inc., Beverly Hills, Calif.
Eldorado Tool and Mfg. Corp., Milford, Conn.
Erie Marine, Inc., Erie, Pa.
Institute of Computer Management of Baltimore, Inc., Baltimore, Md.
Institute of Computer Management of Cleveland, Inc., Cleveland, Ohio
Landis Tool Co., Waynesboro, Pa.
Landis Tool Service Co., Waynesboro, Pa.
Division:
Gardner Service Co., Waynesboro, Pa.
Litton Bionetics, Inc., Bethesda, Md.
Litton Business Systems, Inc., New York, N. Y.
Divisions:
Carlisle Div., San Francisco, Calif.
Cole Div., York, Pa.
Decotone U.S. Div., Westminster, Mass.
Divisions:
Carolina Gravure Div., Lexington, S. C.
Gravure Div., Holyoke, Mass.
Financial Printing Div., San Francisco, Calif.
Fitchburg Coated Products Div., Fitchburg, Mass.
Fitchburg Paper Co. Div., Fitchburg, Mass.
Kimball Systems Div., Belleville, N. J.
Lehigh-Leopold Furniture Div., New York, N. Y.
Litton Office Products Centers Div., Floral Park, N. Y.
Divisions:
Atlas Litton Office Products Center, Floral Park, N. Y.
Everett-Waddey Litton Office Product Center, Richmond, Va.
Litton Office Products Center, Boston, Mass.
Maverick-Clarke Litton Office Products Center (Texas)
Olympic Litton Office Products Center, New York, N. Y.
Plimpton's Litton Office Products Center, Hartford, Conn.
Monroe Div., Orange, N. J.
Royal Imperial Div., Hartford, Conn.
Division:
Royal Typewriter Co. Div., Hartford, Conn.
Roytype Div., West Hartford, Conn.
Streater Div., Albert Lea, Minn.
Sturgis-Newport Business Forms Div., Sturgis, Mich.
Sweda Intl. Div., Orange, N. J.
Litton Business Telephone Systems, Inc., Sunnyvale, Calif.
Litton Credit Corp., Beverly Hills, Calif.
Litton Educational Publishing Inc., New York, N. Y.
Divisions:
American Book Div., New York, N. Y.
Delmar Publishers, Albany, N. Y.
Litton Educational Publishing International, New York, N. Y.
McCormick-Mathers Publishing Co. Div.
D. Van Nostrand Co. Div.
Van Nostrand Reinhold Co., New York, N. Y.
Litton Great Lakes Corp., Erie, Pa.
Litton Industrial Products, Inc., Beverly Hills, Calif.
Divisions:
Contromatics Div., Rockville, Conn.
Eureka X-Ray Tube Co., Chicago, Ill.
Hand Tool Div., New Britain, Conn.
Division:
Storms Drop Forging Div., New Britain, Conn.
Litton Dental Products, Toledo, Ohio
Litton Medical Systems, Elk Grove, Ill.
Louis Allis Drives & Systems Div., Milwaukee, Wis.
Louis Allis Div., Milwaukee, Wis.
Lucas Machine Div., Cleveland, Ohio
Merriman Div., Hingham, Mass.
New Britain Machine Div., New Britain, Conn.
New Britain Plastics Machine Div., Berlin, Conn.
Reed Rolled Thread Die Co. Div., Holden, Mass.
Union/Butterfield Div., Athol, Mass.
Xcel Mold & Machine Div., North Canton, Ohio

(Continued—next page)

Exhibit B — Standard and Poors Register, 1976, Vol. 1; Moody's Industrial Manual, 1975, Vol. 2 and Directory of Corporate Affiliations, 1976 attached to Sevor Affidavit.

LITTON INDUS., INC.—(Continued)

Litton Industries Credit Corp., Stamford, Conn.
Litton Industries Leasing Corp., Jackson, Miss.
Litton Precision Products Intl., Inc., Beverly Hills, Calif.

Litton Systems, Inc., Beverly Hills, Calif.
Divisions:
Advanced Circuitry Div., Springfield, Mo.
Aero Products Div., Woodland Hills, Calif.
Airtron Div., Morris Plains, N. J.
Amecom Div., College Park, Md.
Clifton Precision Div., Clifton Heights, Pa.
Datalog Div., Melville, N. Y.
Data Systems Div., Van Nuys, Calif.
Electron Tube Div., San Carlos, Calif.
Guidance & Control Systems Div., Woodland Hills, Calif.
Hewitt-Robins Div., Reston, Va.
Hewitt-Robins Conveyor & Equipment Div., Passaic, N. J.
Hewitt-Robins Crushing & Vibrating Equipment Div., S. C.
Ingalls Shipbuilding Div., Pascagoula, Miss.
Jefferson Electric Div., Bellwood, Ill.
Kester Solder Div., Chicago, Ill.
Larsen-Hogue Div., Los Angeles, Calif.
Liberty Copper & Wire Div., Downers Grove, Ill.
Litton Microwave Cooking Products, Minneapolis, Minn.
Litton Precision Gear Div., Chicago, Ill.
Litton Reston Computer Center, Reston, Va.
Mellonics Systems Development Div., Sunnyvale, Calif.
Memory Products Div., Canoga Park, Calif.
Poly-Scientific Div., Blacksburg, Va.
Potentiometer Div., Mount Vernon, N. Y.
Robins Engineers & Constructors Div., Totowa, N. J.
Triad-Utrad Div., Huntington, Ind.
Union Chain Div., Sandusky, Ohio
Unit Handling Systems Div., Florence, Ky.
Winchester Electronics Div., Oakville, Conn.

Litton Systems International, Inc., Beverly Hills, Calif.
Saphier, Lerner, Schindler Environetics, New York, N. Y.
Sol-Tex Mineral Co., Inc., Beverly Hills, Calif.
Standard Components Corp., Beverly Hills, Calif.
Valentine Pulp & Paper Co., Lockford, La.
West Coast Electronics Corp., Beverly Hills, Calif.
Western Arabian Geophysical Co., Houston, Tex.

Western Geophysical Co. of America, Houston, Tex.
Divisions:
Aero Service Div., Beverly Hills, Calif.
Westrex Div., Beverly Hills, Calif.

Westrex Company, Asia, Philadelphia, Pa.
Westrex Company, East, Philadelphia, Pa.
Westrex Company, Iberica, Philadelphia, Pa.
Westrex Company, Italy, Philadelphia, Pa.

Foreign Subsidiaries:
Delmar Publisher (Canada) Ltd., Scarborough, Ont., Can.
Kester Solder Co. of Canada Ltd., Brantford, Ont., Can.
Labelplans Ltd., Toronto, Ont., Can.
LICC of Canada Ltd., Montreal, Que., Can.
Litton Business Equipment Ltd., Toronto, Ont., Can.
Litton Business Systems of Canada Ltd., Scarborough, Ont., Can.
Litton Microwave Cooking Products (Canada) Ltd., Quebec, Can.
Litton Systems (Canada) Ltd., Rexdale, Ont., Can.
Standard Desk Ltd., Laval, Que., Can.
Streater Industries (Canada) Ltd., Orillia, Can.
Division:
Brand-Worth Div., Ontario, Can.
Van Nostrand Reinhold Ltd., Toronto, Ont., Can.
Western Geophysical Company of Canada, Ltd., Calgary, Alb., Can.

•
LLOYD'S ELECTRONICS INC.
18601 S. Susana Rd., Compton, Calif. 90221
Tel.: 213-537-3720
LYD—(ASE)
Chm. Bd.—Abraham Zacha
Pres.—Paul Chudnow
Treas.—James Cohen
Sec.—William Friedland
Legal—Leon Katz

Subsidiaries:
Lloyd's Disc Corp., Compton, Calif.
Lloyds Electronics of California, Inc., Compton, Calif.
Lloyd's Electronics, Inc., Elk Grove Village, Ill.
Lloyd's Electronics, Inc., Elmwood Park, N. J.
Lloyd's Electronics International, Compton, Calif.
Lloyd's Western Corp., Compton, Calif.

Affiliate:
Products International, Canoga Park, Calif. (50%)

Foreign Subsidiaries:
Detson Products, Inc., Canada
Lloyd's Electronics Ltd., Canada
Lloyd's Electronics GmbH, Hamburg, Germany
Lloytron Electronics Ltd., Peterborough, England (50%)

•
LOBLAW, INC.
678 Bailey Ave., Buffalo, N. Y. 14240
Tel.: 716-825-1111
LOBL—(OTC)
Pres. & Chief Exec. Officer—W. Galen Weston
V. P., Controller & Treas.—John A. Ritz
Sec.—Sheldon Douglass

Retail Stores:
Loblaw, Inc. retail supermarkets located in Northern N. Y.; Pa.; Ohio
Better Foods retail stores located in Los Angeles, Calif.
Louis Stores located in Northern California

Warehouses:
Located in Buffalo, Cheektowaga, Syracuse, N. Y.

•
LOCKHEED AIRCRAFT CORP.
2555 N. Hollywood Way, Burbank, Calif. 91503
Tel.: 213-847-6121
LK—(NYSE)
Chm. Bd.—Daniel J. Haughton
Pres.—A. Carl Kotchian
Treas.—Robert N. Waters
Sec.—James J. Ryan
Gen. Counsel—John E. Cavanagh

Operating Companies:
Aviquipo, Inc., New York, N. Y.
Lockheed Aircraft Service Co., Ontario, Calif.
Lockheed Air Terminal, Inc., Burbank, Calif.
Lockheed-California Co., Burbank, Calif.
Lockheed Electronics Co., Inc., Plainfield, N. J.
Lockheed-Georgia Co., Marietta, Ga.
Lockheed International Co., Burbank, Calif.
Lockheed Missiles & Space Co., Inc., Sunnyvale, Calif.
Lockheed Propulsion Co., Redlands, Calif.
Lockheed Shipbuilding & Construction Co., Seattle, Wash.
Murdock Machine & Engineering Co. of Texas, Irving, Tex.

Foreign Operating Companies:
Lockheed Aircraft International, A.B., Geneva, Switzerland
Lockheed Aircraft International Ltd., Kowloon, Hong Kong
Lockheed Aircraft Service Singapore Pvt. Ltd., Singapore
Lockheed Petroleum Services Ltd., New Westminster, B. C., Can.

INDEX TO DIVS.

Exhibit C – Stock Purchase Notice
attached to Sevor Affidavit.

KEEP THIS NOTICE FOR YOUR TAX RECORDS

STOCK PURCHASE NOTICE

LITTON INDUSTRIES, INC. COMMON STOCK HAS BEEN PURCHASED FOR YOU AS A RESULT OF YOUR PARTICIPATION IN THE LITTON INDUSTRIES EMPLOYEES' STOCK PURCHASE PLAN. STOCK CERTIFICATES WILL BE ISSUED TO YOU FROM TIME TO TIME IN ACCORDANCE WITH THE TERMS OF THE PLAN.

NUMBER OF SHARES	PURCHASE PRICE	COMPANY CONTRIBUTION	AMOUNT DEDUCTED FROM YOUR ACCOUNT FOR THIS PURCHASE	YOUR ACCOUNT BALANCE AFTER THIS PURCHASE	
				AMOUNT	AS OF THIS DATE
1	$ 24.77	$ 4.95	$ 19.82-	$ 14.90	02 28 72

EMPLOYEE NAME & ADDRESS

JOHN P DIXON
550 MAIN ST EAST
ROCHESTER N Y 14604

ACCOUNT 18636 54-2 -

EMPLOYEE COPY

THE TRUSTEES
LITTON INDUSTRIES EMPLOYEES' STOCK PURCHASE PLAN

KEEP THIS NOTICE FOR YOUR TAX RECORDS

STOCK PURCHASE NOTICE

LITTON INDUSTRIES, INC. COMMON STOCK HAS BEEN PURCHASED FOR YOU AS A RESULT OF YOUR PARTICIPATION IN THE LITTON INDUSTRIES EMPLOYEES' STOCK PURCHASE PLAN. STOCK CERTIFICATES WILL BE ISSUED TO YOU FROM TIME TO TIME IN ACCORDANCE WITH THE TERMS OF THE PLAN.

NUMBER OF SHARES	PURCHASE PRICE	COMPANY CONTRIBUTION	AMOUNT DEDUCTED FROM YOUR ACCOUNT FOR THIS PURCHASE	YOUR ACCOUNT BALANCE AFTER THIS PURCHASE	
				AMOUNT	AS OF THIS DATE
2	$ 24.04	$ 4.80	$ 19.24-	$ 5.37	09 30 72

EMPLOYEE NAME & ADDRESS

JOHN P DIXON
550 MAIN ST EAST
ROCHESTER N Y 14604

ACCOUNT 18686 54-2 -

RECEIVED
NOV 13 1972
ROYAL McBEE CORP.

EMPLOYEE COPY

THE TRUSTEES
LITTON INDUSTRIES EMPLOYEES' STOCK PURCHASE PLAN

KEEP THIS NOTICE FOR YOUR TAX RECORDS

STOCK PURCHASE NOTICE

LITTON INDUSTRIES, INC. COMMON STOCK HAS BEEN PURCHASED FOR YOU AS A RESULT OF YOUR PARTICIPATION IN THE LITTON INDUSTRIES EMPLOYEES' STOCK PURCHASE PLAN. STOCK CERTIFICATES WILL BE ISSUED TO YOU FROM TIME TO TIME IN ACCORDANCE WITH THE TERMS OF THE PLAN.

NUMBER OF SHARES	PURCHASE PRICE	COMPANY CONTRIBUTION	AMOUNT DEDUCTED FROM YOUR ACCOUNT FOR THIS PURCHASE	YOUR ACCOUNT BALANCE AFTER THIS PURCHASE	
				AMOUNT	AS OF THIS DATE
16	$ 73.12	$ 14.56	$ 58.56	$ 2.25	01 31 1975

EMPLOYEE NAME & ADDRESS

JOHN DIXON
155 DELEWARE AVE
DELMAR NEW YORK 12054
****
SWEDA INTERNATIONAL
34 MAPLE AVENUE
PINE BROOK, N. J. 07058

ACCOUNT 61-128362699
003 20 0000 00269441

SP-6-18-02

EMPLOYEE COPY

THE TRUSTEES
LITTON INDUSTRIES EMPLOYEES' STOCK PURCHASE PLAN

JAN 30, 1969

IN ACCOUNT WITH

Fahnestock & Co.
(Established 1881)
110 WALL STREET
NEW YORK, N. Y. 10005
TEL. 212 WHITEHALL 3-8900

MRS GERALDINE BELL
730 KENMOOR RD
[illegible] N. Y. 14612

DATE	CONTRACT	QUANTITY BOUGHT	QUANTITY SOLD	DESCRIPTION	PRICE	AMOUNT DEBIT	AMOUNT CREDIT	BAL DEBIT UNLES
C1-CH				CHECK	ROC	210.59		
C1-CH			3	LITTON IND INC	72 1/4		210.59	
C1-CH		3		LITTON IND INC	REC			

PLEASE RETAIN THIS STATEMENT FOR INCOME TAX PURPOSES
(SEE REVERSE SIDE FOR AGREEMENT, ETC.)

Exhibit D — Record of Sale of Litton Industry Stock attached to Sevor Affidavit.

Exhibit E – Newspaper Article attached to Sevor Affidavit.

22 THE BATAVIA DAILY NEWS — Wed., March 17, 1976

SWEDA INTERNATIONAL DIVISION OF LITTON INDUSTRIES — Has immediate position for person to field service data processing equipment. Applicant must have completed high school with experience, or additional education background with electro-mechanical and electronic equipment. Military experience considered. Salary based on experience with opportunity for advancement. All interviews by appointment only. Please send resume to P.O. Box 346, Batavia, New York, 14020.

Exhibit F – U.S. Marshal's Return of Service attached to Sevor Affidavit.

U.S. MARSHALS SERVICE
INSTRUCTION AND PROCESS RECORD

INSTRUCTIONS: See "INSTRUCTIONS FOR SERVICE OF PROCESS BY THE U.S. MARSHAL" on the reverse of the last (*No. 5*) copy of this form. Please type or print legibly, insuring readability of all copies. Do not detach any copies.

PLAINTIFF: Geraldine Sevor — COURT NUMBER: 75-[illegible]

DEFENDANT: Litton Industries and McBee Systems — TYPE OF WRIT: Subpoena Duces Complaint

SERVE / AT — NAME OF INDIVIDUAL, COMPANY, CORPORATION, ETC., TO SERVE OR DESCRIPTION OF PROPERTY TO SEIZE OR CONDEMN: Litton Industries

ADDRESS (*Street or RFD, Apartment No., City, State and ZIP Code*): 255 North Goodman Street, Rochester, New York 14607

SEND NOTICE OF SERVICE COPY TO NAME AND ADDRESS BELOW:

Emmelyn Logan-Baldwin
510 Powers Building
Rochester, New York 14614

Show number of this writ and total number of writs submitted, i.e., 1 of 1, 1 of 3, etc. — NO. 1 OF TOTAL 2

CHECK IF APPLICABLE: ☐ One copy for U. S. Attorney or designee and two copies for Attorney General of the U. S. included.

SHOW IN THE SPACE BELOW AND TO THE LEFT ANY SPECIAL INSTRUCTIONS OR OTHER INFORMATION PERTINENT TO SERVING THE WRIT DESCRIBED ABOVE.

SPECIAL INSTRUCTIONS:

The local office Litton Industries, McBee Systems is 255 North Goodman Street, Rochester, New York. Our information is that David Miller is in charge of the office and would be a managing agent and/or person authorized to receive process.

NAME AND SIGNATURE OF ATTORNEY OR OTHER ORIGINATOR requesting service on behalf of: [signature] — TELEPHONE NUMBER: 716-232-2282 — DATE: 12/22/75

SPACE BELOW FOR USE OF U.S. MARSHAL ONLY - DO NOT WRITE BELOW THIS LINE

Show amount of deposit (*or applicable code*) and sign USM-285 for first writ only if more than one writ submitted.	DEPOSIT/CODE	DIST. OF ORIGIN	DISTRICT TO SERVE	LOCATION OF SUB-OFFICE OF DIST. TO SERVE
		5 5	5 5	Rochester, N. Y.

I acknowledge receipt for the total number of writs indicated and for the deposit (*if applicable*) shown.	SIGNATURE OF AUTHORIZED USMS DEPUTY OR CLERK	DATE
	[signature]	1/5/76

☒ I hereby certify and return that I have personally served, have legal evidence of service, or have executed as shown in "REMARKS," the writ described on the individual, company, corporation, etc., at the address shown above or on the individual, company, corporation, etc., at the address inserted below.

☐ I hereby certify and return that, after diligent investigation, I am unable to locate the individual, company, corporation, etc., named above within this Judicial District.

NAME AND TITLE OF INDIVIDUAL SERVED (*If not shown above*): David H. Miller, Branch Manager — ☐ A person of suitable age and discretion then abiding in the defendant's usual place of abode.

ADDRESS (*Complete only if different than shown above*)

FEE (*If applicable*): $3.00 — MILEAGE: $ .48

DATE(S) OF ENDEAVOR (*Use Remarks if necessary*)	DATE OF SERVICE	TIME	SIGNATURE OF U. S. MARSHAL OR DEPUTY
	1/5/76	2:15 PM	[signature] Deputy USM.

REMARKS: 1/6/76

Initial Deposit: -0-

Cost for Service: 6.00
.48

Balance Due: 6.48

Please Make Remittance Payable to U. S. Marshal

USM-285 (Ed. 7-1-70) — 3. NOTICE OF SERVICE

AFFIRMATION OF EMMELYN LOGAN-BALDWIN IN SUPPORT OF PLAINTIFF'S CROSS-MOTION TO COMPEL DISCOVERY; OPPOSITION TO DEFENDANTS' MOTION TO DISMISS.

UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF NEW YORK

GERALDINE SEVOR, Plaintiff, -vs- LITTON INDUSTRIES and MCBEE SYSTEMS, a Subsidiary of Litton Industries, Defendants.	AFFIRMATION IN SUPPORT OF PLAINTIFF'S CROSS-MOTION TO COMPEL DISCOVERY; OPPOSITION TO DEFENDANTS' MOTION TO DISMISS

Emmelyn Logan-Baldwin, under penalties of perjury, affirms the following:

1. I am an attorney at law duly licensed to practice my profession in the State of New York. I am the attorney for the plaintiff in this action. I am familiar with the pleadings and proceedings herein. This affirmation is submitted in support of plaintiff's cross-motion to compel discovery and in opposition to defendants' motion to dismiss.

2. As is outlined in detail in plaintiff's affidavit submitted herewith, the motion of the defendants relating to the service on the defendants and relating to the claims of the plaintiff are without merit and should be denied. All of the documents requested in the Notice to Produce are relevant as a matter of law in an employment discrimination case and must be produced.

3. Process has been served on the defendants herein in proceedings brought by Geraldine Sevor before the New York

State Division of Human Rights and relating to employment discrimination practiced by the defendants. The subpoena I caused to be served was served on David Miller, on behalf of the defendants-David Miller was also served in this action on behalf of the defendants. Before the Division there has been no claim that service was not properly made.

4. We know from papers submitted by the defendants to the Division, see letter of Paul J. Olivo to James B. Doyle, April 4, 1975, Exhibit G, attached hereto, that upon service on David Miller in Rochester, Litton Industries, Inc. directed local counsel to appear on behalf of Litton Industries, Inc.

Emmelyn Logan-Baldwin

March 18, 1976

Exhibit G – Letter of Paul J. Olivo to James B. Doyle, dated 4-4-75 attached to Logan-Baldwin Affirmation.

APR 1 1

April 4, 1975

James B. Doyle, Esq.
Burns, Suter & Doyle
529 Times Square Building
45 Exchange Street
Rochester, N.Y. 14614

Re: Geraldine Savor v. McBee Systems,
A Subsidiary of Litton Industries
Case No. VI-CS-2885-75

Dear Mr. Doyle:

This letter is in confirmation of our telephone discussion of today, when I contacted you in regard to arranging representation for Litton Industries at a hearing scheduled before the State Division of Human Rights on Tuesday, April 15, 1975 in Rochester.

In addition to a copy of my complete file on the matter, I have also included the original copy of a letter dated March 31, 1975 from William F. Pech to Mr. Edward D. Lynch, Regional Director of the New York State Division of Human Rights, which letter is to explain Mr. Pech's absence. I would also expect that you will be receiving in the mail shortly a package of additional documents from the office of John Holman, who is with McBee Systems in Carlstadt, N.J.

When a member of your firm who is to handle this matter has had sufficient time to absorb the material and the issues involved, I would like to discuss the matter via telephone.

Thank you for your cooperation, and I shall look forward to our further communications.

Very truly yours,

Paul J. Olivo
Division Counsel

PJO:ag
Attachments

cc: Dan Johnson - Buffalo ✓
Joseph Behan - Rochester
David Miller - Rochester
John Holman - Carlstadt

AFFIRMATION OF EMMELYN LOGAN-BALDWIN IN SUPPORT OF PLAINTIFF'S CROSS-MOTION TO COMPEL DISCOVERY; OPPOSITION TO DEFENDANTS' MOTION TO DISMISS.

CERTIFICATE OF SERVICE

I hereby certify that I have served the foregoing Notice of Cross-Motion to Compel Discovery; Opposition to Defendants Motion to Dismiss, Plaintiff's Affidavit in Support of Cross-Motion to Compel Discovery; Opposition to Defendants' Motion to Dismiss, and Affirmation in Support of Plaintiff's Cross-Motion to Compel Discovery; Opposition to Defendants' Motion to Dismiss on the defendants by my causing a copy thereof to be delivered to the office of attorneys for the defendants Brennan, Centner, Palermo & Blauvelt, 509 Reynolds Arcade Building, Rochester, New York this 8th day of March 1976.



Emmelyn Logan-Baldwin
Attorney for Plaintiff
Office and P.O. Address:
510 Powers Building
Rochester, New York 14614

DEFENDANTS' AFFIDAVIT OF DAVID MILLER, sworn to 3-25-76 in Support of Motion to Dismiss.

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF NEW YORK

GERALDINE SEVOR,
76 Henrietta Street
Rochester, New York 14620

Plaintiff,

-vs-

LITTON INDUSTRIES
255 North Goodman Street
Rochester, New York 14607

and

McBEE SYSTEMS, A Subsidiary of
Litton Industries
255 North Goodman Street
Rochester, New York 14607

Defendants.

AFFIDAVIT

Civ. No. 75-559

STATE OF NEW YORK)
COUNTY OF MONROE) SS.:

DAVID MILLER, being duly sworn, deposes and says:

1. I am a resident of Monroe County, and this affidavit is submitted in support of a motion to dismiss the complaint in the above-captioned proceeding.

2. On January 5, 1976, I was employed as a Sales Representative in the Rochester office of McBee Systems, a Division of Kimball Systems, a Division of Litton Business Systems, Inc. I started work in January, 1971, employed as a Sales Representative by Litton Automated Business Systems (also known as "Litton ABS"), a Division of Litton Business Systems, Inc. In late 1974, the forms division of Litton ABS was re-established as the McBee System of Kimball Systems Division of Litton Business Systems, Inc. During the period of over three years in which I was employed at the Rochester office of Litton ABS and/or McBee Systems, a Division of Kimball Systems, a Division of Litton Business Systems, Inc., I received pay from Litton Business Systems, Inc. A copy of my W-2 Form for the year 1975 is attached hereto as Exhibit "A" as evidence of my

employment. I have never been employed by Litton Industries, Inc., nor have I ever received salary or compensation from Litton Industries, Inc. On March 3, 1976, I terminated my employment with McBee Systems, Litton Business Systems, Inc. and commenced new employment with another company in Rochester.

3. On January 5, 1976, at the office of McBee Systems, 145 College Avenue, Rochester, New York, I received two (2) copies of a summons and complaint in the above-captioned matter. At the time of delivery of these papers, I was not an officer or managing or general agent of Litton Industries, Inc. or McBee Systems, Litton Business Systems, Inc., nor was I then or at any other time authorized by appointment or by law to receive service of process by or on behalf of said organizations. On receipt of the summonses and complaints, I forwarded them by mail to Dan Johnson, the District Manager of McBee Systems, Division of Kimball Systems, Litton Business Systems, Inc. with offices at 5820 Main Street, Williamsville, New York 14221.

David Miller
DAVID MILLER

Sworn to before me this
25th day of March, 1976.

Anthony R. Palermo
Notary Public

ANTHONY R. PALERMO
NOTARY PUBLIC, State of N. Y., Monroe County
My Commission Expires March 30, 1977

Exhibit A — Copy of W-2 Form for 1975 attached to Miller Affidavit.

McBEE SYSTEMS
LITTON BUSINESS SYSTEMS, INC. 22-1124150
ROUTE 50 EAST
ATHENS, OHIO 45701

Type or print EMPLOYER'S name, address, ZIP code and Federal identifying number

Wage and Tax Statement 1975

State form number: NT IT 2102 — **Copy C** For employee's records

City form number:

Employer's State identifying number: 22-1124150 Lit

Employee's social security number	1 Federal income tax withheld	2 Wages, tips, and other compensation	3 FICA employee tax withheld	4 Total FICA wages
093-32-0920	1,845.30	12,418.93	719.79	12,303.78

Type or print Employee's name, address, and ZIP code below

David M. Miller
45 White Village Dr.
Rochester, N Y. 14625
093-32-0920

5 Was employee covered by a qualified pension plan, etc.?	6	7
yes		
8 State or local tax withheld	9 State or local wages	10 State or locality
403.51	12,303.78	New York
11 City or local tax withheld	12 City or local wages	13 City or locality

Form W—2 This information is being furnished to the Internal Revenue Service. APPROVED [illegible] Department of the Treasury—Internal Revenue Service 12-2678063

DEFENDANTS' AFFIDAVIT OF DAN JOHNSON, sworn to 3-31-76 in Support of Motion to Dismiss.

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF NEW YORK

GERALDINE SEVOR,
76 Henrietta Street
Rochester, New York 14620

Plaintiff,

-vs- AFFIDAVIT

LITTON INDUSTRIES
255 North Goodman Street
Rochester, New York 14607

and

McBEE SYSTEMS, A Subsidiary of
Litton Industries
255 North Goodman Street
Rochester, New York 14607

Defendants.

STATE OF NEW YORK)
COUNTY OF MONROE) SS:

DAN JOHNSON, being duly sworn, deposes and says:

1. I am the District Manager of McBee Systems, a Division of Kimball Systems, which is a Division of Litton Business Systems, Inc. Litton Business Systems, Inc. is a New York Corporation with principal offices located at New York, New York, and is a wholly owned subsidiary of Litton Industries, Inc. I maintain my office at 5820 Main Street, Williamsville, New York. The Rochester office of McBee Systems is located at 145 College Avenue, Rochester, New York and is within my district and is under my supervision. This affidavit is submitted in support of a motion on behalf of the defendants in the above matter to dismiss the complaint herein. I am familiar with the facts hereinafter stated by reason of my position as District Manager and/or based upon personal knowledge thereof.

DEFE DANTS' AFFIDAVIT OF DAN JOHNSON, sworn to 3-31-76 in Support of Motion to Dismiss.

2. Records of my office (attached hereto collectively as Exhibit "A") reveal the following:

A. During the period from November 6, 1964 through August 31, 1973, one Geraldine (Dell) Sevor was employed at various times as follows:

(1) By Royal Typewriter, a Division of Royal McBee Corporation from November 6, 1964 to February 19, 1965, and thereafter to June 27, 1967 by Royal Typewriter Company, Inc., a Delaware Corporation.

(2) By McBee Systems, which was part of the Royal Typewriter Company, Inc., from February 12, 1968 to September 27, 1968. A leave of absence was granted from September 27, 1968 for personal reasons.

(3) By Automated Business Systems, a Division of Litton Business Systems, Inc., from March 10, 1969 to August 31, 1973, the last day on which plaintiff worked.

(4) On or about July 16, 1973, Geraldine (Dell) Sevor resigned her position as computer installation supervisor effective August 31, 1973. A copy of a memorandum of telephone conversation signed by plaintiff confirming said resignation is attached hereto as Exhibit "B".

(5) At no time was plaintiff employed or paid by Litton Industries, Inc. From the time of the transfer of functions of the Royal Typewriter Company to Litton Business Systems, Inc., plaintiff was employed and paid by Litton Business Systems, Inc. See copies of her pay checks and wage statement attached as part of Exhibit "A".

3. On February 19, 1965, Litton Industries, Inc. acquired Royal McBee Corporation and separated the Royal Typewriter Company and the McBee Company into two separate divisions.

DEFENDANTS' AFFIDAVIT OF DAN JOHNSON, sworn to 3-31-76 in Support of Motion to Dismiss.

The plaintiff was employed by the McBee Systems Division, which around early 1969 became Litton Automated Business Systems, a Division of Litton Business Systems, Inc., a wholly owned subsidiary of Litton Industries, Inc. Litton Automated Business Systems was also known as "Litton ABS", but always remained a Division of Litton Business Systems, Inc. In or about late 1974, the functions of Litton Automated Business Systems were transferred by Litton Business Systems, Inc. to two other divisions. The computer operations were transferred to its Sweda International Division and the form business was reestablished under the name McBee Systems, which became a part of Kimball Systems, a Division of Litton Business Systems, Inc. The use of the name "Litton Automated Business Systems", also known as "Litton ABS" was discontinued after such transfer.

4. In or about October and November, 1974, as District Manager for McBee Systems, a Division of Kimball Systems, a Division of Litton Business Systems, Inc., I interviewed applicants for employment as sales persons with McBee Systems. One of the persons contacted by me was the plaintiff, Geraldine Sevor. Originally, both the Rochester and Buffalo offices of McBee Systems were allocated two (2) positions each, but in late December, 1974 or early January, 1975, I was notified that the Buffalo and Rochester allocations were each reduced to one person. Thereafter, I notified Geraldine Sevor personally that the sales position for which I had originally solicited her was no longer available due to an economic cutback by McBee Systems. My decision not to hire Geraldine Sevor was not in any way because of her sex.

5. Thereafter, a copy of a complaint in the New York State Division of Human Rights in a matter captioned

"Geraldine Sevor, Complainant, against McBee Systems, a Subsidiary of Litton Industries, Respondent", was served on McBee Systems in Rochester. A copy of said complaint and an amendment thereto are annexed as Exhibits "C-1" and "C-2". The respondent in that proceeding is McBee Systems. Litton Industries, Inc. is not the respondent.

6. On April 29, 1975, a Notice of Charge of Employment Discrimination from the Equal Employment Opportunity Commission, Buffalo District Office, Charge No. TBU5-0361, dated April 28, 1975, was received at the Rochester office of McBee Systems. A copy of said notice is attached hereto as Exhibit "D". The date of the alleged violation is February 24, 1975, and the place is alleged to be Rochester, New York. Under "nature of charge" is designated "hiring" and "training/ apprenticeship." To my knowledge no other charges against McBee Systems have been filed by or on behalf of Geraldine Sevor. On or about October 6, 1975, I received from the Rochester office a Notice of Right to Sue within 90 days with reference to case No. TBU5-0364, relating to the complaint of Geraldine Sevor. A copy of said Notice of Right to Sue is annexed as Exhibit "E". No other Notice of Right to Sue has been received by McBee Systems relating to the plaintiff herein.

7. On information and belief, on January 5, 1976, David Miller, a Sales Representative of the Rochester office of McBee Systems located at 145 College Avenue, Rochester, New York, was served with two copies of the summons and complaint in the above-entitled action, and he forwarded the same to me. At the time of service of said papers, David Miller was an employee of McBee Systems, a Division of Kimball Systems, a Division of Litton Business Systems, Inc. He was not an officer

or managing or general agent of McBee Systems or Litton Business Systems, Inc. or Litton Industries, Inc., nor was he authorized by appointment or by law to accept service of process on behalf of said organizations.

7. In view of all the foregoing and the affidavits of David Miller and Robert H. Lentz, also submitted in support of this motion to dismiss, it is respectfully submitted the facts demonstrate that neither Litton Industries, Inc., nor McBee Systems, a Division of Kimball Systems, a Division of Litton Business Systems, Inc. have been properly served with process pursuant to Rule 4 of the Federal Rules of Civil Procedure.

WHEREFORE, your deponent respectfully requests the Court to declare the purported service of process upon Litton Industries, Inc. and McBee Systems null and void and to quash the return of service of the summons and to grant such other relief as the Court may deem just and proper, including the relief requested in the Notice of Motion dated February 10, 1976, and the papers in support thereof.

DAN JOHNSON

Sworn to before me this
31 day of March, 1976.

Anthony R. Palermo
Notary Public

ANTHONY R. PALERMO
NOTARY PUBLIC, State of N. Y., Monroe County
My Commission Expires March 30, 1977

Exhibit A – Office Records, A-1 thru A-22
attached to Johnson Affidavit.

P314 REV. 1/64

ROYAL M[illegible]E CORPORATION

#6. ORIGINATING OFFICE COPY

EMPLOYMENT NOTICE

DATE PREPARED	ORIGINATING OFFICE	TRANS CODE	DIV. DIST. NO.	EMP. NO.	SOCIAL SECURITY NO.	REVIEWED BY PERSONNEL
11 6 54	Rochester, NY		1 015		055 40 2313	

ORIGINATING OFFICE

DESCRIPTION		FIELD CODE	FIELD	CH
EMPLOYEE NAME	Geraldine Sharon Sevor	M105		32L
ADDRESS	330 Kavanaugh Road	106		32L
CITY - STATE	Honeoye Falls, NY	107		32L
EFFECTIVE DATE OF EMPLOYMENT	11/9/54	110		6R
MARITAL STATUS (M-1 S-2)	Single	M111		1R
SEX (M-1 F-2)	Female	M112		1R
DATE OF BIRTH	9/6/45	113		6R
JOB CLASSIFICATION CODE	Office Clerk	115		1R
SALARY GRADE	$65.00	116		2R
SALARY AMOUNT PER PAYROLL PERIOD (EXCEPT SALES)	$6[illegible].00	M123		7R
EXEMPT / NON-EXEMPT (E-1 N-2)	N-2	120		1R
SCHEDULED WORK HOURS PER WEEK (EXCEPT SALES & EXEMPT)	40	M1[illegible]		4R
FEDERAL TAX EXEMPTIONS (NUMBER OF EXEMPTIONS)	0	M12[illegible]		2R
STATE TAX EXEMPTIONS (NUMBER OF EXEMPTIONS)	0	130		2R
COUNTY TAX EXEMPTIONS (NUMBER OF EXEMPTIONS)		131		2R
LOCAL TAX EXEMPTIONS (NUMBER OF EXEMPTIONS)		132		2R

DEPT. CHARGED TO: Typewriter

PAYMENT BASIS: HOURLY ☐ WEEKLY ☒ SEMI-MON. ☐ MONTHLY ☐

WORK BASIS: ADDITION ☒ REPLACE ☐ TEMPORARY-UNTIL ☐ _____

EXEMPT ☐ NON-EXEMPT ☒

WAS EMPLOYEE WITH COMPANY BEFORE? YES ☐ NO ☒ WHEN _____ WHERE _____ CONTINUITY OF SERVICE FROM _____

JOB TITLE: Office Clerk COMPENSATION PLAN _____ ◀ SERVICE, SALES, MGMT, CLERICAL GROUP I, II, ETC.

REMARKS:

IS THIS EMPLOYEE A TRANSFER: YES ☐ NO ☒

▲ DO NOT WRITE BELOW THIS LINE – EXCEPT FOR AUTHORIZATION ▲

TRANSACTION CODE

001	NON SALES
015	SALES
016	DEAL'R DIST.

JOB CLASS CODE

1	CLERICAL
2	SERVICE EMPL.
3	SHIPPING EMPL.
4	SALESMAN
5	SALES MANAGER
6	TRUCK DRIVER
7	MAINTENANCE

IN ORDER TO EFFECTIVELY PROCESS THE NEW EMPLOYEE PLEASE FORWARD FOLLOWING:

- **ALL EMPLOYEES**
  - GROUP INSURANCE ENROLLMENT OR WAIVER
  - APPLICATION FORM
  - FIDELITY BOND
  - W-4 WITHHOLDING TAX FORM
  - OTHER TAX FORMS (WHERE APPLICABLE)
  - REFERENCE CHECK LIST
  - APPLICATION EVALUATION SUMMARY
  - PERSONAL ACCIDENT INSURANCE ENROLLMENT (OPTIONAL)
- **CLERICAL**
  - CLERICAL APPLICANTS CHECK LIST
  - CLERICAL TESTS
- **SALES**
  - SALESMAN'S EMPLOYMENT AGREEMENT (CONTRACT)
  - APPROVED SALES PERSONNEL REQUISITION
- **SALES & SERVICE**
  - PRELIMINARY INTERVIEW FORM
  - GUIDED INTERVIEW FORM
  - TESTS

SEND COMPLETED PAPERS TO: PERSONNEL ADMINISTRATION SERVICES DEPT.
850 THIRD AVE.
NEW YORK, N. Y. 10022

PERSONNEL

SERVICE AWARD	(AUTH. SIGNATURE) CUMULATIVE REPORT	EMPLOYEE RECORD CARD	GROUP INSURANCE	(AUTH. SIGNATURE) WAIVER	FIDELITY BOND SENT	PERSONAL ACCIDENT INS.	SALARY ADMINISTRATION	(AUTH. SIGNATURE) COPY DISTRIBUTION
☐	☐	☐	☐	☐	☐	☐	☐	☐

Ex. A-1

Exhibit A — Office Records, A-1 thru A-22
attached to Johnson Affidavit.

ROYAL McBEE CORPORATION

TO District Manager - Rochester

FROM Thomas J. Mallon, Employee Services Manager

DATE December 10, 1964

☐ Group Insurance

☒ Personal Accident Geraldine S. Sevor (EMPLOYEE) Paid ☒ WKLY. ☐ S-MO. ☐ MO.

ATTENTION MANAGER: After reading this notice, please present it with the enclosed attachments, if any, to the above named employee. ONLY THE STATEMENT (S) FOR WHICH THE BOX(ES) ARE MARKED WITH AN (X) APPLY TO THE EMPLOYEE.

☒ NEW ENROLLMENT OR REINSTATEMENT:

Employee's contribution will be deducted as of December, 1964 (MONTH) $.55 (CONTRIBUTION)

The employee's insurance coverage (and eligible dependents, if any) will be effective as of the date shown on the enclosed certificate subject to the terms of our Insurance Plan.

☐ Employee's dependent(s) _____ (NAME AND RELATIONSHIP)

have been withdrawn from coverage in our Plan effective _____

☐ Employee's dependent(s) _____ (NAME AND RELATIONSHIP)

have been added for coverage subject to the terms of our Plan effective _____

☐ Employee's readjusted contribution will be deducted of _____ (MONTH) _____ (CONTRIBUTION)

☐ Employee's contribution will no longer be deducted as of _____ (MONTH)

since the employee has withdrawn from coverage in our Plan.

☐ Employee's beneficiary has been changed as indicated by the attached rider.

☐ The enclosed duplicate certificate, rider or both have been issued to the above employee

cc: EDP Accounting for Eastern

RMcB 889

Ex. A-2

Exhibit A — Office Records, A-1 thru A-22 attached to Johnson Affidavit.

E313 3/64

ROYAL McBEE CORPORATION
CHANGE NOTICE

DATE	ORIGINATING OFFICE	DIV. DIST. NO.	EMPL. NO.	SOCIAL SECURITY NO.	REVIEWED BY PERSONNEL →
5 7 65	Rochester, NY	1 013	103	066 40 2313	

NAME: Geraldine Sharon Sevor

1 ADDRESS: (STREET) 330 Savanaugh Road (CITY) Honeoye Falls (STATE) New York (ZIP CODE)

NAME & ADDRESS CHANGE — INSERT NEW STATUS BELOW IF CHANGED

CHANGE NAME TO

MARITAL STATUS (CHANGE TO) ☐ MARR. ☐ SINGLE

2 CHANGE ADDRESS TO

PENSION NUMBER:

OCCUPATION - DEPT. - SALARY CHANGE — INSERT NEW STATUS BELOW IF CHANGED

CHANGE FROM	CHANGE TO	
OCCUPATION: Office Clerk	OCCUPATION: Same	EXEMPT/NON-EXEMPT (E=1, N=2): ☐ 1
DEPARTMENT: Office	DEPARTMENT: Same	*JOB CLASS CODE (CODING IS ON BOTTOM): ☐ 2

3 SALARY: $ 65.00 per HR WK S/M MO ☒ — SALARY: $ 70.00 per HR WK ☒ S/M MO

DATE LAST INCREASE — AMOUNT — EFFECTIVE DATE: May 24, 1965

REASON LAST INCREASE — REASON THIS INCREASE: MERIT ☐ ADJUST. ☐ PROMOT. ☐ DEMOT. ☐ NO CHNG. ☐

LOCATION CHANGE / TRANSFER OUT (SEE NOTE 3 BELOW)

TRANSFERRED TO → DIV. DIST. NO. 101-102 | EMPL. NO. 103 | SOCIAL SECURITY NO. 104

4 SALARY PAID THRU — EFFECTIVE DATE — PENSION NO.

FORMER POSITION

TERMINATION NOTICE — INSERT INFORMATION BELOW

SALARY PAID THROUGH (INCLUDING PAY FOR) VACATION - NO. DAYS ☐ SEVERANCE - NO. DAYS ☐ IN LIEU OF NOTICE - NO. DAYS ☐ — LAST DAY WORKED (IF BEYOND LAST DAY WKD.) MO. DAY YEAR

VOLUNTARY ☐ INVOLUNTARY ☐ RECOMMENDED FOR REEMPLOY. ☐ NOT RECOMMENDED ☐ SLRY. PD. THRU

5 PERFORMANCE ATTITUDE INITIATIVE DEPENDABILITY (INDICATE EXCELL., GOOD, FAIR, POOR)

DATE EMPLOYED BY CO. DATE EMPLOYED BY TERMINATING OFFICE PENSION NO.

POSITION AT TERMINATION SALARY WHEN TERMINATED per

REASON FOR TERMINATION (STATE IN DETAIL)

NOTE: Originating Office: IMPORTANT

1. Follow directions on form. Supply all information required. Do not write in areas reserved for Home Office use.
2. Boxes 2 and 3 (right sections) are to be filled in only when actual change has taken place and new data is to be inserted as shown.
3. When employee is changing location, copy #6 of this form must be sent to his new location. An employment notice will be prepared at this new location.
4. Refer to SPI WS 1815.13 for detailed instruction.

***JOB CLASS CODE**

1. Clerical
2. Service Employees
3. Shipping Employees
4. Sales Mgr.
5. Salesman
6. Truck Driver
7. Maintenance

AUTHORIZATIONS	TITLES
1.	1.
2.	2.
3.	3.

SERVICE AWARD ☐ ACCUMULATIVE REPORT ☐ EMPL. RECORD CARD ☐ SALARY ADMIN. ☐ COPY DIST. ☐

7 — ORIGINATING OFFICE FILE COPY

Ex. A-3

Exhibit A — Office Records, A-1 thru A-22
attached to Johnson Affidavit.

8113 1/64

ROYAL McBEE CORPORATION
CHANGE NOTICE

DATE	ORIGINATING OFFICE	DIV. DIST. NO. 101-102	EMPL. NO. 103	SOCIAL SECURITY NO. 104	REVIEWED BY PERSONNEL →
4/7/65	Rochester, NY	2 01		064 40 2313	

1 NAME: Geraldine Sharon Sevor

ADDRESS (STREET): 330 Kavanaugh Road (CITY): Honeoye Falls (STATE): New York (ZIP CODE): 14472

NAME & ADDRESS CHANGE — INSERT NEW STATUS BELOW IF CHANGED

2 CHANGE NAME TO: Geraldine Dell

MARITAL STATUS (CHANGE TO): 1 MARRIED ☐ 2 SINGLE ☐

CHANGE ADDRESS TO: 330 Kavanaugh Road, Honeoye Falls, New York

PENSION NUMBER:

OCCUPATION - DEPT. - SALARY CHANGE — INSERT NEW STATUS BELOW IF CHANGED

3

CHANGE FROM	CHANGE TO
OCCUPATION	OCCUPATION
DEPARTMENT	DEPARTMENT
SALARY $ per (HR WK S/M MO)	SALARY $ per (HR WK S/M MO)
DATE LAST INCREASE / AMOUNT	EFFECTIVE DATE
REASON LAST INCREASE	REASON THIS INCREASE: MERIT ☐ ADJUST. ☐ PROMOT. ☐ DEMOT. ☐ NO CHNG. ☐

EXEMPT/NON-EXEMPT (E=1, N=2): 1 ☐ 2 ☐

*JOB CLASS CODE (CODING IS ON BOTTOM)

LOCATION CHANGE / TRANSFER OUT (SEE NOTE 3 BELOW)

4 TRANSFERRED TO → DIV. DIST. NO. 101-102 | EMPL. NO. 103 | SOCIAL SECURITY NO. 104

SALARY PAID THRU / EFFECTIVE DATE / PENSION NO.

FORMER POSITION

TERMINATION NOTICE — INSERT INFORMATION BELOW

5 SALARY PAID THROUGH (INCLUDING PAY FOR) VACATION - NO. DAYS ☐ SEVERANCE - NO. DAYS ☐ IN LIEU OF NOTICE - NO. DAYS ☐

LAST DAY WORKED / SLRY. PD. THRU (IF BEYOND LAST DAY WKD.) — NO. DAY YEAR

VOLUNTARY ☐ INVOLUNTARY ☐ RECOMMENDED FOR REEMPLOY. ☐ NOT RECOMMENDED ☐

PERFORMANCE ATTITUDE INITIATIVE DEPENDABILITY (INDICATE EXCELL., GOOD, FAIR, POOR)

DATE EMPLOYED BY CO. / DATE EMPLOYED BY TERMINATING OFFICE / PENSION NO.

POSITION AT TERMINATION / SALARY WHEN TERMINATED per

REASON FOR TERMINATION (STATE IN DETAIL)

NOTE: Originating Office: IMPORTANT

1. Follow directions on form. Supply all information required. Do not write in areas reserved for Home Office use.
2. Boxes 2 and 3 (right sections) are to be filled in only when actual change has taken place and new data is to be inserted as shown.
3. When employee is changing location, copy #6 of this form must be sent to his new location. An employment notice will be prepared at this new location.
4. Refer to SPI WS 1815.13 for detailed instruction.

***JOB CLASS CODE**

1. Clerical
2. Service Employees
3. Shipping Employees
4. Sales Mgr.
5. Salesman
6. Truck Driver
7. Maintenance

AUTHORIZATIONS	TITLES
1.	1.
2.	2.
3.	3.

SERVICE AWARD ☐ ACCUMULATIVE REPORT ☐ EMPL. RECORD CARD ☐ SALARY ADMIN. ☐ COPY DIST. ☐

7 — ORIGINATING OFFICE FILE COPY

Ex. A-4

Exhibit A — Office Records, A-1 thru A-22
attached to Johnson Affidavit.

9313 1/66

ROYAL McBEE CORPORATION
CHANGE NOTICE

DATE	ORIGINATING OFFICE	DIV. DIST. NO.	EMPL. NO.	SOCIAL SECURITY NO.	REVIEWED BY PERSONNEL →
11 16 65	Rochester, NY	101 015	193	066 40 2313	

NAME: Geraldine Sharon Dell

ADDRESS: 330 (STREET) Cavanaugh Road (CITY) Honeoye Falls (STATE) New York (ZIP CODE)

1

NAME & ADDRESS CHANGE — INSERT NEW STATUS BELOW IF CHANGED

CHANGE NAME TO

MARITAL STATUS (CHANGE TO) ☐ MARRIED ☐ SINGLE

CHANGE ADDRESS TO

2

PENSION NUMBER:

OCCUPATION - DEPT. - SALARY CHANGE — INSERT NEW STATUS BELOW IF CHANGED

CHANGE FROM	CHANGE TO
OCCUPATION: Office Clerk	OCCUPATION: Office Clerk
DEPARTMENT: Office	DEPARTMENT: Office
3 SALARY: $ 70.00 per HR ☐ WK ☒ S/M ☐ MO ☐	SALARY: $ 75.00 per HR ☐ WK ☒ S/M ☐ MO ☐

EXEMPT / NON-EXEMPT (E = 1, N = 2): ☐ 1 ☐ 2

*JOB CLASS CODE (CODING IS ON BOTTOM)

DATE LAST INCREASE: 5/24/65 AMOUNT: $5.00

EFFECTIVE DATE: 11/29/65

REASON LAST INCREASE: Merit

REASON THIS INCREASE: MERIT ☒ ADJUST. ☐ PROMOT. ☐ DEMOT. ☐ NO CHNG. ☐

LOCATION CHANGE / TRANSFER OUT (SEE NOTE 3 BELOW)

TRANSFERRED TO → DIV. DIST. NO. | EMPL. NO. 193 | SOCIAL SECURITY NO. 066 40 2313

4 SALARY PAID THRU — EFFECTIVE DATE — PENSION NO.

FORMER POSITION

TERMINATION NOTICE — INSERT INFORMATION BELOW

SALARY PAID THROUGH (INCLUDING PAY FOR) VACATION - NO. DAYS ☐ SEVERANCE - NO. DAYS ☐ IN LIEU OF NOTICE - NO. DAYS ☐

LAST DAY WORKED (IF BEYOND SLRY. PD. THRU / LAST DAY WKD.) MO ☐ DAY ☐ YEAR ☐

VOLUNTARY ☐ INVOLUNTARY ☐ RECOMMENDED FOR REEMPLOY. ☐ NOT RECOMMENDED ☐

PERFORMANCE ____ ATTITUDE ____ INITIATIVE ____ DEPENDABILITY ____
(INDICATE EXCELL., GOOD, FAIR, POOR)

5 DATE EMPLOYED BY CO. — DATE EMPLOYED BY TERMINATING OFFICE — PENSION NO.

POSITION AT TERMINATION ____ SALARY WHEN TERMINATED ____ per ____

REASON FOR TERMINATION (STATE IN DETAIL)

NOTE: Originating Office: **IMPORTANT**

1. Follow directions on form. Supply all information required. Do not write in areas reserved for Home Office use.
2. Boxes 2 and 3 (right sections) are to be filled in only when actual change has taken place and new data is to be inserted as shown.
3. When employee is changing location, copy #6 of this form must be sent to his new location. An employment notice will be prepared at this new location.
4. Refer to SPI WS 1815.13 for detailed instruction.

*JOB CLASS CODE
1. Clerical
2. Service Employees
3. Shipping Employees
4. Sales Mgr.
5. Salesman
6. Truck Driver
7. Maintenance

AUTHORIZATIONS	TITLES
1.	1.
2.	2.
3.	3.

SERVICE AWARD ☐ ACCUMULATIVE REPORT ☐ EMPL. RECORD CARD ☐ SALARY ADMIN. ☐ COPY DIST. ☐

7 - ORIGINATING OFFICE FILE COPY

W12966X

Ex. A-5

Exhibit A — Office Records, A-1 thru A-22 attached to Johnson Affidavit.

8313 1/64

ROYAL McBEE CORPORATION
CHANGE NOTICE

DATE	ORIGINATING OFFICE	DIV. DIST. NO.	EMPL. NO.	SOCIAL SECURITY NO.
6 1 66	Rochester, New York	1/015	103	066 40 2313

REVIEWED BY PERSONNEL →

NAME: Geraldine Sharon Dell

ADDRESS (STREET)	(CITY)	(STATE)	(ZIP CODE)
330 Kavanaugh Road	Honeoye Falls	New York	14472

NAME & ADDRESS CHANGE

INSERT NEW STATUS BELOW IF CHANGED

CHANGE NAME TO

MARITAL STATUS (CHANGE TO) ☐ MARRIED - ☐ SINGLE

CHANGE ADDRESS TO

PENSION NUMBER:

OCCUPATION - DEPT. - SALARY CHANGE

INSERT NEW STATUS BELOW IF CHANGED

CHANGE FROM	CHANGE TO
OCCUPATION: Office Clerk	OCCUPATION: Senior Clerk
DEPARTMENT: Office	DEPARTMENT: Office
SALARY: $ 75.00 per HR ☐ WK ☒ S/M ☐ MO ☐	SALARY: $ 80.00 per HR ☐ WK ☒ S/M ☐ MO ☐
DATE LAST INCREASE: 11/29/66	AMOUNT: $5.00
REASON LAST INCREASE: Merit	EFFECTIVE DATE: 6/13/66

EXEMPT/NON-EXEMPT (E = 1, N = 2) ☐ 1 ☐ 2

*JOB CLASS CODE (CODING IS ON BOTTOM)

REASON THIS INCREASE: MERIT ☐ ADJUST. ☐ PROMOT. ☒ DEMOT. ☐ NO CHNG. ☐

LOCATION CHANGE / TRANSFER OUT (SEE NOTE 3 BELOW)

TRANSFERRED TO → DIV. DIST. NO. 101-102 | EMPL. NO. 103 | SOCIAL SECURITY NO. 104

SALARY PAID THRU | EFFECTIVE DATE | PENSION NO.

FORMER POSITION

TERMINATION NOTICE

INSERT INFORMATION BELOW

SALARY PAID THROUGH (INCLUDING PAY FOR) VACATION - NO. DAYS SEVERANCE - NO. DAYS IN LIEU OF NOTICE - NO. DAYS

LAST DAY WORKED (IF BEYOND SLRY. PD. THRU) (LAST DAY WKD.) MO. DAY YEAR

VOLUNTARY ☐ INVOLUNTARY ☐ RECOMMENDED FOR REEMPLOY. ☐ NOT RECOMMENDED ☐

PERFORMANCE ATTITUDE (INDICATE EXCELL., GOOD, FAIR, POOR) INITIATIVE DEPENDABILITY

DATE EMPLOYED BY CO. DATE EMPLOYED BY TERMINATING OFFICE PENSION NO.

POSITION AT TERMINATION SALARY WHEN TERMINATED per

REASON FOR TERMINATION (STATE IN DETAIL)

NOTE: Originating Office:

IMPORTANT

1. Follow directions on form. Supply all information required. Do not write in areas reserved for Home Office use.
2. Boxes 2 and 3 (right sections) are to be filled in only when actual change has taken place and new data is to be inserted as shown.
3. When employee is changing location, copy # 6 of this form must be sent to his new location. An employment notice will be prepared at this new location.
4. Refer to SPI WS 1815.13 for detailed instruction.

*JOB CLASS CODE

1. Clerical
2. Service Employees
3. Shipping Employees
4. Sales Mgr.
5. Salesman
6. Truck Driver
7. Maintenance

AUTHORIZATIONS	TITLES
1.	1.
2.	2.
3.	3.

SERVICE AWARD ☐ ACCUMULATIVE REPORT ☐ EMPL. RECORD CARD ☐ SALARY ADMIN. ☐ COPY DIST. ☐

7 - ORIGINATING OFFICE FILE COPY

Ex. A-6

Exhibit A — Office Records, A-1 thru A-22 attached to Johnson Affidavit.

8313 7/64

ROYAL McBEE CORPORATION
CHANGE NOTICE

DATE	ORIGINATING OFFICE	DIV. DIST. NO. 101-102	EMPL. NO. 103	SOCIAL SECURITY NO. 104	REVIEWED BY PERSONNEL →
1 16 67	Rochester, NY	1 015		066 40 2313	

NAME: Geraldine Sharon Dell

ADDRESS (STREET): 330 Kavanagh Road (CITY): Honeoye Falls (STATE): New York (ZIP CODE): 14472

NAME & ADDRESS CHANGE

CHANGE NAME TO

CHANGE ADDRESS TO

PENSION NUMBER:

INSERT NEW STATUS BELOW IF CHANGED

MARITAL STATUS (CHANGE TO) ☐ MARRIED ☐ SINGLE

OCCUPATION - DEPT. - SALARY CHANGE

CHANGE FROM	CHANGE TO
OCCUPATION: Senior Clerk	OCCUPATION: Senior Clerk
DEPARTMENT: Office	DEPARTMENT: Office
SALARY: $ 80.00 per HR WK S/M MO [X]	SALARY: $ 85.00 per HR WK S/M MO [X]
DATE LAST INCREASE: 6/13/66	AMOUNT: 5.00
REASON LAST INCREASE: Promotion	EFFECTIVE DATE: 1/30/67

INSERT NEW STATUS BELOW IF CHANGED

EXEMPT/NON-EXEMPT (E=1, N=2) ☐ 1 ☐ 2

*JOB CLASS CODE (CODING IS ON BOTTOM)

REASON THIS INCREASE: MERIT [X] ADJUST. ☐ PROMOT. ☐ DEMOT. ☐ NO CHNG. ☐

LOCATION CHANGE / TRANSFER OUT (SEE NOTE 3 BELOW)

TRANSFERRED TO → DIV. DIST. NO. 101-102 | EMPL. NO. 103 | SOCIAL SECURITY NO. 104

SALARY PAID THRU — EFFECTIVE DATE — PENSION NO.

FORMER POSITION

TERMINATION NOTICE

INSERT INFORMATION BELOW

SALARY PAID THROUGH (INCLUDING PAY FOR) VACATION - NO. DAYS SEVERANCE - NO. DAYS IN LIEU OF NOTICE - NO. DAYS

VOLUNTARY ☐ INVOLUNTARY ☐ RECOMMENDED FOR REEMPLOY. ☐ NOT RECOMMENDED ☐

LAST DAY WORKED / SLRY. PD. THRU (IF BEYOND LAST DAY WKD.) — MO. DAY YEAR

PERFORMANCE ____ ATTITUDE ____ INITIATIVE ____ DEPENDABILITY ____ (INDICATE EXCELL., GOOD, FAIR, POOR)

DATE EMPLOYED BY CO. — DATE EMPLOYED BY TERMINATING OFFICE — PENSION NO.

POSITION AT TERMINATION — SALARY WHEN TERMINATED ____ per ____

REASON FOR TERMINATION (STATE IN DETAIL)

NOTE: Originating Office: **IMPORTANT**

1. Follow directions on form. Supply all information required. Do not write in areas reserved for Home Office use.
2. Boxes 2 and 3 (right sections) are to be filled in only when actual change has taken place and new data is to be inserted as shown.
3. When employee is changing location, copy #6 of this form must be sent to his new location. An employment notice will be prepared at this new location.
4. Refer to SPI WS 1815.13 for detailed instruction.

*JOB CLASS CODE
1. Clerical
2. Service Employees
3. Shipping Employees
4. Sales Mgr.
5. Salesman
6. Truck Driver
7. Maintenance

AUTHORIZATIONS / TITLES

1. ____ 1. ____
2. ____ 2. ____
3. ____ 3. ____

SERVICE AWARD ☐ ACCUMULATIVE REPORT ☐ EMPL. RECORD CARD ☐ SALARY ADMIN. ☐ COPY DIST. ☐

7 - ORIGINATING OFFICE FILE COPY

Ex. A-7

Exhibit A — Office Records, A-1 thru A-22 attached to Johnson Affidavit.

8313 1/64

ROYAL McBEE CORPORATION
CHANGE NOTICE

DATE	ORIGINATING OFFICE	DIV. DIST. NO. 101-103	EMPL. NO. 102	SOCIAL SECURITY NO. 104	REVIEWED BY PERSONNEL →
7/17/67	Rochester	1 015		066 40 2313	

NAME: Geraldine S. Dell

ADDRESS (STREET): ~~330 Kenyon Road~~ (CITY): ~~Honeoye Falls~~ (STATE): New York (ZIP CODE): 14472

NAME & ADDRESS CHANGE — INSERT NEW STATUS BELOW IF CHANGED

CHANGE NAME TO:

CHANGE ADDRESS TO: 482 So. Phelps Rd Honeoye Falls, N.Y. 14472

MARITAL STATUS (CHANGE TO): ☐ MARRIED ☐ SINGLE

PENSION NUMBER:

OCCUPATION - DEPT. - SALARY CHANGE — INSERT NEW STATUS BELOW IF CHANGED

CHANGE FROM	CHANGE TO
OCCUPATION	OCCUPATION
DEPARTMENT	DEPARTMENT
SALARY $ per HR WK S/M MO	SALARY $ per HR WK S/M MO

EXEMPT/NON-EXEMPT (E = 1, N = 2) ☐ 1 ☐ 2

*JOB CLASS CODE (CODING IS ON BOTTOM)

DATE LAST INCREASE — AMOUNT — EFFECTIVE DATE

REASON LAST INCREASE — REASON THIS INCREASE: MERIT ☐ ADJUST. ☐ PROMOT. ☐ DEMOT. ☐ RECLSNG. ☐

LOCATION CHANGE / TRANSFER OUT (SEE NOTE 3 BELOW)

TRANSFERRED TO → DIV. DIST. NO. 101-103 | EMPL. NO. 102 | SOCIAL SECURITY NO. 104

SALARY PAID THRU — EFFECTIVE DATE — PENSION NO.

FORMER POSITION

TERMINATION NOTICE — INSERT INFORMATION BELOW

SALARY PAID THROUGH: 7/28/67 (INCLUDING PAY PDS) — VACATION - NO. DAYS: 5 days — SEVERANCE - NO. DAYS — IN LIEU OF NOTICE - NO. DAYS

LAST DAY WORKED (IF BEYOND LAST DAY WKD.) — SLRY. PD. THRU — MO. DAY YEAR

VOLUNTARY ☒ — INVOLUNTARY ☐ — RECOMMENDED FOR REEMPLOY ☒ — NOT RECOMMENDED ☐

PERFORMANCE: Good — ATTITUDE: Good — INITIATIVE: Good — DEPENDABILITY: Good
(INDICATE EXCELL., GOOD, FAIR, POOR)

DATE EMPLOYED BY CO.: 11/64 — DATE EMPLOYED BY TERMINATING OFFICE — PENSION NO.

POSITION AT TERMINATION: Senior Clerk — SALARY WHEN TERMINATED: 88.00 wk per

REASON FOR TERMINATION (STATE IN DETAIL):
To heavy of a work load - did not want to work under so much pressure.

NOTE: Originating Office:

IMPORTANT

1. Follow directions on form. Supply all information required. Do not write in areas reserved for Home Office use.
2. Boxes 2 and 3 (right sections) are to be filled in only when actual change has taken place and new data is to be inserted as shown.
3. When employee is changing location, copy # 6 of this form must be sent to his new location. An employment notice will be prepared at this new location.
4. Refer to SPI WS 1815.13 for detailed instruction.

*JOB CLASS CODE
1. Clerical
2. Service Employees
3. Shipping Employees
4. Sales Mgr.
5. Salesman
6. Truck Driver
7. Maintenance

AUTHORIZATIONS — TITLES

1. — 1. District Manager
2. — 2.
3. — 3.

SERVICE AWARD ☐ — ACCUMULATIVE REPORT ☐ — EMPL. RECORD CARD ☐ — SALARY ADMIN. ☐ — COPY DIST. ☐

7 - ORIGINATING OFFICE FILE COPY

GW125065X PRINTED IN U.S.A.

Ex. A-8

Exhibit A — Office Records, A-1 thru A-22 attached to Johnson Affidavit.

June 27, 1967

Mr. Frank O'Connor
Royal Typewriter Company
245 East Avenue
Rochester, New York

Mr. O'Connor:

This is to advise Royal Typewriter Company that I am resigning from their employment.

I am giving six weeks notice or until you are able to hire someone to replace me, whichever is sooner.

Sincerely,

Geraldine Dell

Week of Aug. 4th.

Ex. A-4

Exhibit A — Office Records, A-1 thru A-22 attached to Johnson Affidavit.

8701 REV 5/65

ROYAL

ROYAL TYPEWRITER COMPANY, INC. A DIVISION OF [illegible] INDUSTRIES

EMPLOYMENT NOTICE AND AGREEMENT

ORIGINATING OFFICE COPY

REGION NAME	DISTRICT NAME	DATE PREPARED
Eastern	Rochester	2 | 12 | 68

SALES EMPLOYEE: TRAINEE ○ JR ○ SALESMAN ○ MGR. ○ | SALARIED EMPL. ⊗ | TRANS. CODE | REG. DIST. 101 1 \| 102 150 | EMPL. NO. 103 | SOCIAL SECURITY NO. 104 066-40-2311 | EMPLOYEE NAME (M105-28) GERALDINE DELL

EMPLOYEE ADDRESS (106-28) 482 PHELPS ROAD

EMPLOYEE CITY - STATE - ZIP CODE (107-28) HONEOYE FALLS NEW YORK

EFFECTIVE DATE HIRED	M110	2/12/68	4L	OVERRIDE % ON SALES	167	4R
MARITAL STATUS (M-1 S-2)	M111	1	1	MCBEE COMM. % - CITY A	156	5R
SEX (M-1 F-2)	M112	2	1	MCBEE COMM. % - CITY B	157	5R
DATE OF BIRTH	113	9/6/45	4L	MCBEE COMM. % - CITY E	160	5R
JOB CODE (SEE BELOW)	115	1	1	MCBEE COMM. % - CITY C	161	5R
EXEMPT/NON-EXEMPT (E-1 N-2)	120	N-2	1	MCBEE COMM. % - PROV. A	162	5R
SALARY AMOUNT	123	[redacted]	7L	MCBEE COMM. % - PROV. B	163	5R
SCHEDULED WORK HRS./WEEK	M125	40	4L	MCBEE COMM. % - PROV. E	164	5R
FED. TAX EXEMPTS (NUMBER)	M127	0	2L	MCBEE COMM. % - PROV. C	165	5R
STATE TAX EXEMPTS (NUMBER)	130	0	2L	MGR. OVERRIDE %	171	4R
COUNTY TAX EXEMPTS (NUMBER)	131	0	2L	MGR. OVERRIDE % - B	172	4R
LOCAL TAX EXEMPTS (NUMBER)	132	0	2L	MGR. OVERRIDE % - E	173	4R
DRAW AMT. PER PAY PERIOD	151		4L	MGR. OVERRIDE % - C	174	4R
MGRS ANNL. COMM. LIMIT AMOUNT	153		4L	MGR. ANNL. COMM. LIMIT - NEW	317	4L
SALARY GRADE	116		2L	MGR. ANNL. COMM. LIMIT	320	4L

ORIGINAL CONTRACT ⊗ | REVISED CONTRACT ○ | REASON FOR REVISION | PRODUCT LINE | TERRITORY | EFF. DATE - MCBEE ACCTS.

WORK BASIS: ADDITION ○ REPLACEMENT ⊗ TEMPORARY - UNTIL | EMPL. PENSION NUMBER | WAS EMPL. TRANSFERRED? YES ○ NO ⊗ | WHEN? | CONTINUITY OF SERVICE FROM

PAYMENT BASIS: HOURLY ○ WKLY. ⊗ SEMI-MON ○ MONTHLY ○ | DEPT. CHARGED MCBEE | WAS EMPL. EVER WITH COMPANY BEFORE? YES ⊗ NO ○ | WHEN? 1964-1967 | WHERE? ROCHESTER NEW YORK

JOB TITLE (SALES OR SALARIED)	COMPENSATION PLAN (ROYLEASE)	EFFECTIVE DATES	NOTE	SALARY	DRAW
Secretary	$190.00 SM Salary	2-12-68	SALES EMPLOYEES ARE PAID SEMI-MONTHLY	190.00 SM	

ADDITIONAL INFORMATION (BONUS PLAN, MISC. OVERRIDE RATES, ETC.)

TO SALES EMPLOYEES: IT IS UNDERSTOOD AND AGREED THAT ALL PROVISIONS OF THE TERMS WHICH APPEAR ON A SEPARATE DOCUMENT ATTACHED HERETO, MADE A PART HEREOF, AND EXECUTED BY THE EMPLOYEE, TOGETHER WITH THE COMPANY'S RULES AND REGULATIONS, AS THE SAME MAY BE CONSTITUTED FROM TIME TO TIME, ARE ACCEPTED BY THE EMPLOYEE AND MADE A PART HEREOF AS THOUGH EXPRESSLY SET FORTH HEREIN.

CHECK BOX IF EMPL. IS: NEG. ORIENT. ○ AM. IND. ○ SP. AMER. ○ | EMPL. CITIZENSHIP | EMPLOYEE SIGNATURE | DATE 2-12-68 | REVIEW BY PERS.

		TITLE	DATE
AUTHORIZED SIGNATURE	John W. Hunt	District Mgr.	2 | 9 | 12 | 68
AUTHORIZED SIGNATURE	[illegible]	Eastern Regional Manager	2 | 15 | 68
AUTHORIZED SIGNATURE	[illegible]	Vice President - Marketing	

SERVICE AWARD	CUMULATIVE REPORT	EMPLOYEE RECORD CARD	GROUP INSURANCE	WAIVER	FIDELITY BOND SENT	PERSONAL ACCIDENT INS.	SALARY ADMINISTRATION	COPY DISTRIBUTION	TAX DEPARTMENT
☐	☐	☒	☒	☐	☒	☐	☐	☒	☐

JOB CODE
1. CLERICAL
2. SERVICE EMPL.
3. SHIPPING EMPL.
4. SALES MANAGER
5. SALESMAN
6. TRUCK DRIVER
7. MAINTENANCE

TRANSACTION NO
001 - SALARIED
015 - SALES

ALSO FORWARD FOLLOWING—

ALL EMPLOYEES - GROUP INSURANCE ENROLLMENT OR WAIVER - APPLICATION - FIDELITY BOND - TAX FORMS (W-4, ETC.) - REFERENCE CHECK LIST - APPLICATION EVALUATION SUMMARY - PERSONAL ACCIDENT INSURANCE ENROLLMENT (OPTIONAL).

CLERICAL - CHECK LISTS - TESTS

SALES - APPROVED SALES PERSONNEL REQ. - SIGNED TERMS.

SALES AND SERVICE - PRELIMINARY INTERVIEW - GUIDED INTERVIEW - TESTS.

NOTES TO ORIGINATOR:

1. ENTER INFO. IN FIELD CODES BEGINNING AT LEFT OF BOX.
2. FIELD CODES REQUIRING DIGITS ONLY MUST HAVE INDICATED NUMBER OF DIGITS. IF NECESSARY FILL OUT FIELD WITH ZEROS AS INDICATED - TO THE LEFT (L) OR TO THE RIGHT (R). CONVERT PERCENTS TO DECIMALS THEN FILL OUT FIELD. DO NOT ENTER DOLLAR, PERCENT, DECIMAL, SIGNS, ETC.
   EXAMPLES: M110 - JAN. 1, 1965 S/B 010165, M111 - MARRIED S/B 1
   123 - $25.14 S/B 0002514, 115 - 10 HRS S/B 10750
   107 - 3% S/B 03000, 153 - 10% S/B 02000.
3. FIELD CODES REQUIRING ALPHABETIC INFORMATION (NAME, ADDRESS) ARE RESTRICTED TO THE INDICATED NUMBER OF CHARACTERS.
4. MCBEE RESERVE ACCOUNT BEGINS ONE YEAR AFTER DATE OF REGULAR ACCOUNT.

PRINTED IN U.S.A. [illegible]

Ex. A-10

Exhibit A — Office Records, A-1 thru A-22 attached to Johnson Affidavit.

9437 REV. 1/64

ROYAL McBEE CORPORATION
NOTICE OF LEAVE

ORIGINATING OFFICE

NAME	POSITION	OFFICE	DATE OF BIRTH	LAST DAY WORKED
Geraldine Dell	Secretary	Rochester	9/6/45	9/27/68

REASON FOR LEAVE: ☐ SICKNESS OR DISABILITY ☐ WORKMEN'S COMPENSATION ☐ MATERNITY ☐ MILITARY ☐ JURY DUTY ☒ PERSONAL

(P-C 101 102) DIV. DIST. NO.	(103) EMPL. NO.	(104) SOCIAL SECURITY NO.	DATE RETURNED TO WORK
21/70		066-40-2313	12/2/68

PERSONNEL

EMPLOYMENT DATE: 2 12 68 — CONTINUITY OF SERVICE GUARANTEED

GRANTED

WITH PAY: FROM _____ TO _____

WITHOUT PAY: FROM 9/27/68 TO 12/2/68

EXTENSION GRANTED

WITH PAY: FROM _____ TO _____

WITHOUT PAY: FROM _____ TO _____

NECESSARY ACCOMPANYING PAPERS

1. SICKNESS, MATERNITY — DOCTOR'S NOTE
2. JURY DUTY — NOTICE TO APPEAR, CERTIFICATE OF ATTENDANCE
3. PERSONAL — WRITTEN REQUEST FROM EMPLOYEE
4. MILITARY — ORDERS, DISCHARGE, ETC. (WHICHEVER PERTINENT)
5. WORKMEN'S COMPENSATION — INSURANCE COMPANY FORMS

FOR EDP ACCOUNTING USE ONLY

(LEAVE OF ABSENCE—TERMINATION OF LEAVE) TRANSACTION CODE 008

DESCRIPTION	FIELD CODE	FIELD	CH
PARTIAL PAY AMT. (SALARY AMT. / PAYROLL PRD.)	123		7R
VARIABLE SALARY AMOUNT	215		±6R
SALARY CHRGD TO ACCOUNT NO.	121		9R
SALARY CHRGD. TO ACCOUNT NO.	121		9R
DRAW AMOUNT PER PAY	151		6R
VARIABLE DRAW AMOUNT	254		±6R
STOP PAYMENT CODE 257 000			1R
HASH TOTAL	100		5R

(STOP PAYMENT & RESUME PAYMENT) TRANSACTION CODE 009

DESCRIPTION	FIELD CODE	FIELD	CH
STOP PAYMENT CODE 257 000			1R
RESUME PAYMENT DATE	271		6R
VARIABLE SALARY AMOUNT	215		±6R
VARIABLE DRAW AMOUNT	254		±6R
HASH TOTAL	100		5R

John W. Hart
(AUTHORIZED SIGNATURE)

(AUTHORIZED SIGNATURE)

I have been an employee of Royal and McBee for approximately three and one-half years and have been the McBee Office secretary since last February. My husband was drafted into the Army in April 1968 and is now stationed at Fort Benning, Georgia for some advanced training for atleast three months. Through mutual friends I have an opportunity to spend two months of this time near Fort Benning. I am most anxious to be with my husband as long as possible since his next assignment will undoubtedly be overseas.

Geraldine Dell

H Hart

Please inform us when she returns to work.

4 ACKNOWLEDGMENT COPY

Ex. A-11

Exhibit A — Office Records, A-1 thru A-22 attached to Johnson Affidavit.

FORM S-799
REPLACES B313
AND B-437

AUTOMATED BUSINESS SYSTEMS

DIVISION OF LITTON BUSINESS SYSTEMS, INC.

NOTICE OF CHANGE IN EMPLOYEE STATUS - INCLUDING NOTICE OF LEAVE

DATE	ORIGINATING OFFICE	OFFICE NO. / DIV. / DEPT.	EMPLOYEE NO.	SOCIAL SECURITY NO.	REVIEWED BY: DATE
3 11 69	Rochester	21/70		066-40-2313	

EMPLOYEE NAME: Geraldine Dell

EMPLOYEE'S HOME PHONE NO. (INCLUDE AREA CODE): 716-624-1020

BUSINESS ADDRESS: 245 East Avenue, Rochester, New York 14604 (STREET / CITY / STATE AND ZIP CODE)

HOME ADDRESS: 330 Kavanaugh Road, Honeoye Falls, New York 14472 (STREET / CITY / STATE AND ZIP CODE)

NAME AND/OR ADDRESS CHANGE

CHANGE NAME TO:

CHANGE ADDRESS TO:

MARITAL STATUS - CHANGE TO:

PENSION NO.

OCCUPATION - DEPT. OR DIV. - SALARY CHANGE. EXEMPT ☐ NON-EX. ☐

OCCUPATION CHANGE	CHANGE OCCUPATION FROM	TO
DEPT OR DIVISION CHANGE	CHANGE DEPT. OR DIV. FROM	TO
SALARY CHANGE	CHANGE SALARY FROM: $ _____ PER HR. / WK. / B/W / S/M / MO. / YR. (CIRCLE APPLICABLE PAY PERIOD)	TO: $ _____ PER HR. / WK. / B/W / S/M / MO. / YR. (CIRCLE APPLICABLE PAY PERIOD)

DATE LAST INCREASE	AMT/LAST INCREASE	REASON FOR LAST INCREASE	EFFECTIVE DATE THIS CHANGE	REASON FOR THIS CHANGE

LOCATION CHANGE - TRANSFER OUT - PAYROLL LOCATION CHANGE

CHANGE LOCATION TO: EFFECTIVE DATE: SALARY PAID THROUGH (DATE):

CHANGE PAYROLL LOCATION TO:

NOTICE OF LEAVE

REASON FOR LEAVE - CHECK ✓: SICKNESS OR DISABILITY ☐ WORKMAN'S COMP ☐ MATERNITY ☐ MILITARY ☐ JURY DUTY ☐ PERSONAL ☒ OTH. ☐

DATE EMPLOYED	LAST DAY WORKED	DATE RET'D. TO WORK
2 12 69	9 27 68	3 10 69

GRANTED WITH PAY	GRANTED WITHOUT PAY
FROM _____ TO _____	FROM _____ TO _____
EXTENSION GRANTED WITH PAY: FROM _____ TO _____	EXTENSION GRANTED WITHOUT PAY: FROM _____ TO _____

NECESSARY ACCOMPANYING PAPERS (UNDERSCORE)

1. SICKNESS, MATERNITY - DOCTORS NOTE
2. JURY DUTY - NOTICE TO APPEAR, CERT. OF ATTENDANCE
3. PERSONAL - WRITTEN REQUEST FROM EMPLOYEE
4. MILITARY - ORDERS, DISCHARGE, ETC.
5. WORKMAN'S COMPENSATION - INSURANCE COMPANY FORMS

TERMINATION NOTICE

SAL. TO BE PAID THROUGH: _____

INCLUDING PAY FOR: (SHOW NO. OF DAYS FOR EACH CATEGORY) VACATION - NO. DAYS _____ SEVERANCE - NO. DAYS _____ IN LIEU OF NOTICE - NO. DAYS _____

LAST DAY WORKED: _____

TERMINATION VOLUNTARY ☐ TERMINATION INVOLUNTARY ☐ TERMINATION BY MUTUAL AGREEMENT ☐ RE-EMPLOYMENT RECOMMENDED ☐ RE-EMPLOYMENT NOT RECOMMENDED ☐

INDICATE EXCELLENT, GOOD, FAIR OR POOR →	PERFORMANCE	ATTITUDE	INITIATIVE	DEPENDABILITY

POSITION AT TERMINATION	DATE EMPLOYED BY CO.	DATE EMPLOYED BY TERMINATING OFFICE	SALARY WHEN TERM'TD.

REASON FOR TERMINATION IN DETAIL:

AUTHORIZATIONS - SIGNATURES REQUIRED

	TITLES
1. _____	District Manager
2. _____	
3. _____	

SERVICE AWARD ☐ S/A LIST ☐ ACCUM. LIST ☐ EMPL. REC. CARD ☐ SAL. ADM. ☐

COPY DIST. ☐ TERM ELEC. FORM ☐ FRINGE BEN. COS. ☐ CONV. TERM. LIT. ☐

* ORIGINATING OFFICE FILE COPY

PRINTED IN U.S.A.

Ex. A-12

Exhibit A — Office Records, A-1 thru A-22 attached to Johnson Affidavit.

FORM S-299
REPLACES 015
AND 017

AUTOMATED BUSINESS SYSTEMS

DIVISION OF LITTON BUSINESS SYSTEMS, INC.

NOTICE OF CHANGE IN EMPLOYEE STATUS - INCLUDING NOTICE OF LEAVE

DATE	ORIGINATING OFFICE	OFFICE NO. / DIV. / DEPT.	EMPLOYEE NO.	SOCIAL SECURITY NO.	REVIEWED BY	DATE
5/1/69	Rochester, N.Y.	21 70		046-40-2313		

EMPLOYEE NAME	EMPLOYEE'S HOME PHONE NO. (INCLUDE AREA CODE)
Geraldine Dell	716-624-1023

BUSINESS ADDRESS (STREET / CITY / STATE AND ZIP CODE)	HOME ADDRESS (STREET / CITY / STATE AND ZIP CODE)
240 East Avenue-Rochester, N.Y. 14604	320 Mavenaugh Road-Honeoye Falls, N.Y. 14472

NAME AND/OR ADDRESS CHANGE

CHANGE NAME TO	CHANGE ADDRESS TO
MARITAL STATUS - CHANGE TO	PENSION NO.

OCCUPATION - DEPT. OR DIV. - SALARY CHANGE. EXEMPT ☐ NON-EX. ☐

OCCUPATION CHANGE	CHANGE OCCUPATION FROM	TO
DEPT. OR DIVISION CHANGE	CHANGE DEPT. OR DIV. FROM	TO
SALARY CHANGE	CHANGE SALARY FROM: $ 2.8.33 PER HR. WK. B/W S/M MO. YR. (CIRCLE APPLICABLE PAY PERIOD)	TO: $ 216.32 PER HR. WK. B W S M MO. YR. (CIRCLE APPLICABLE PAY PERIOD)

DATE LAST INCREASE	AMT. LAST INCREASE	REASON FOR LAST INCREASE	EFFECTIVE DATE THIS CHANGE	REASON FOR THIS CHANGE
none			5/1/69	Good work & has not had an increase since coming with the company

LOCATION CHANGE - TRANSFER OUT - PAYROLL LOCATION CHANGE

CHANGE LOCATION TO:	EFFECTIVE DATE	SALARY PAID THROUGH (DATE)
CHANGE PAYROLL LOCATION TO:		

NOTICE OF LEAVE

REASON FOR LEAVE - CHECK ✓: SICKNESS OR DISABILITY ☐ | WORKMAN'S COMP ☐ | MATERNITY ☐ | MILITARY ☐ | JURY DUTY ☐ | PERSONAL ☐ | OTH. ☐

DATE EMPLOYED	LAST DAY WORKED	DATE RET'D. TO WORK

GRANTED WITH PAY		GRANTED WITHOUT PAY	
FROM	TO	FROM	TO
EXTENSION GRANTED WITH PAY		**EXTENSION GRANTED WITHOUT PAY**	
FROM	TO	FROM	TO

NECESSARY ACCOMPANYING PAPERS (UNDERSCORE)

1. SICKNESS, MATERNITY - DOCTORS NOTE
2. JURY DUTY - NOTICE TO APPEAR, CERT. OF ATTENDANCE
3. PERSONAL - WRITTEN REQUEST FROM EMPLOYEE
4. MILITARY - ORDERS, DISCHARGE, ETC.
5. WORKMAN'S COMPENSATION - INSURANCE COMPANY FORMS

TERMINATION NOTICE

SAL. TO BE PAID THROUGH	INCLUDING PAY FOR: (SHOW NO. OF DAYS FOR EACH CATEGORY)	LAST DAY WORKED
	VACATION - NO. DAYS _____ SEVERANCE - NO. DAYS _____ IN LIEU OF NOTICE - NO. DAYS _____	

TERMINATION VOLUNTARY ☐ | TERMINATION INVOLUNTARY ☐ | TERMINATION BY MUTUAL AGREEMENT ☐ | RE-EMPLOYMENT RECOMMENDED ☐ | RE-EMPLOYMENT NOT RECOMMENDED ☐

INDICATE EXCELLENT GOOD FAIR OR POOR →	PERFORMANCE	ATTITUDE	INITIATIVE	DEPENDABILITY

POSITION AT TERMINATION	DATE EMPLOYED BY CO.	DATE EMPLOYED BY TERMINATING OFFICE	SALARY WHEN TERM'TD.

REASON FOR TERMINATION IN DETAIL

AUTHORIZATIONS - SIGNATURES REQUIRED	TITLES		
1	District Manager	SERVICE AWARD ☐	COPY DIST. ☐
2		S/A LIST ☐	TERM. ELEC. FORM ☐
3		ACCUM. LIST ☐	FRINGE BEN. COS. ☐
		EMPL. REC. CARD ☐	CONV. TERM. LIT. ☐
		SAL. ADM. ☐	

7. ORIGINATING OFFICE FILE COPY

© 1967 BUSINESS SYSTEMS, ATHENS, O.

PRINTED IN U.S.A.

Ex. A-13

Exhibit A — Office Records, A-1 thru A-22 attached to Johnson Affidavit.

FORM S-229
REPLACES S-213
AND S-227

AUTOMATED BUSINESS SYSTEMS

DIVISION OF LITTON BUSINESS SYSTEMS, INC.

NOTICE OF CHANGE IN EMPLOYEE STATUS - INCLUDING NOTICE OF LEAVE

DATE	ORIGINATING OFFICE	OFFICE NO.	DIV.	DEPT.	EMPLOYEE NO.	SOCIAL SECURITY NO	REVIEWED BY	DATE
11 13 69	Rochester, New York		21	70		065-40-2313		

EMPLOYEE NAME: Geraldine Dell

EMPLOYEE'S HOME PHONE NO. (INCLUDE AREA CODE): 716-544-1020

BUSINESS ADDRESS: 245 East Avenue - Rochester, New York 14604

HOME ADDRESS: 330 Savannah Road, Niagara Falls, N.Y. 14172

STREET / CITY / STATE AND ZIP CODE

NAME AND/OR ADDRESS CHANGE

CHANGE NAME TO:

CHANGE ADDRESS TO:

MARITAL STATUS - CHANGE TO:

PENSION NO.

OCCUPATION - DEPT. OR DIV. - SALARY CHANGE. EXEMPT ☐ NON-EX. ☐

OCCUPATION CHANGE	CHANGE OCCUPATION FROM	TO
DEPT. OR DIVISION CHANGE	CHANGE DEPT. OR DIV. FROM: 260-01	TO: 295
SALARY CHANGE	CHANGE SALARY FROM: $ 216.30 PER HR. WK. B/W S/M MO. YR. (CIRCLE APPLICABLE PAY PERIOD)	TO: $ 262.00 PER HR. WK. B/W S/M MO. YR. (CIRCLE APPLICABLE PAY PERIOD)
	DATE LAST INCREASE: 3/15/69 / AMT. LAST INCREASE / REASON FOR LAST INCREASE	EFFECTIVE DATE THIS CHANGE: 12/1/69 / REASON FOR THIS CHANGE

LOCATION CHANGE - TRANSFER OUT - PAYROLL LOCATION CHANGE

CHANGE LOCATION TO: / EFFECTIVE DATE / SALARY PAID THROUGH (DATE)

CHANGE PAYROLL LOCATION TO:

NOTICE OF LEAVE

REASON FOR LEAVE - CHECK ✓: SICKNESS OR DISABILITY ☐ WORKMAN'S COMP ☐ MATERNITY ☐ MILITARY ☐ JURY DUTY ☐ PERSONAL ☐ OTH. ☐

DATE EMPLOYED / LAST DAY WORKED / DATE RET'D TO WORK

GRANTED WITH PAY: FROM / TO

GRANTED WITHOUT PAY: FROM / TO

EXTENSION GRANTED WITH PAY: FROM / TO

EXTENSION GRANTED WITHOUT PAY: FROM / TO

NECESSARY ACCOMPANYING PAPERS (UNDERSCORE)

1. SICKNESS, MATERNITY - DOCTORS NOTE
2. JURY DUTY - NOTICE TO APPEAR, CERT. OF ATTENDANCE
3. PERSONAL - WRITTEN REQUEST FROM EMPLOYEE
4. MILITARY - ORDERS, DISCHARGE, ETC.
5. WORKMAN'S COMPENSATION - INSURANCE COMPANY FORMS

TERMINATION NOTICE

SAL. TO BE PAID THROUGH / INCLUDING PAY FOR: (SHOW NO. OF DAYS FOR EACH CATEGORY) VACATION - NO. DAYS ____ SEVERANCE - NO. DAYS ____ IN LIEU OF NOTICE - NO. DAYS ____ / LAST DAY WORKED

TERMINATION VOLUNTARY ☐ TERMINATION INVOLUNTARY ☐ TERMINATION BY MUTUAL AGREEMENT ☐ RE-EMPLOYMENT RECOMMENDED ☐ RE-EMPLOYMENT NOT RECOMMENDED ☐

INDICATE EXCELLENT, GOOD, FAIR OR POOR → PERFORMANCE / ATTITUDE / INITIATIVE / DEPENDABILITY

POSITION AT TERMINATION / DATE EMPLOYED BY CO. / DATE EMPLOYED BY TERMINATING OFFICE / SALARY WHEN TERM'D.

REASON FOR TERMINATION IN DETAIL

AUTHORIZATIONS - SIGNATURES REQUIRED / TITLES

1. _____
2. _____ Area Manager
3. _____ Vice President/Marketing

SERVICE AWARD ☐ COPY DIST. ☐
S/A LIST ☐ TERM. ELEC. FORM ☐
ACCUM. LIST ☐ FRINGE BEN. COS. ☐
EMPL. REC. CARD ☐ CONV. TERM. LIT. ☐
SAL. ADM. ☐

7. ORIGINATING OFFICE FILE COPY

© WISLAR MICRO SYSTEMS, ATHENS, O.

PRINTED IN U.S.A.

Ex. A-14

Exhibit A — Office Records, A-1 thru A-22 attached to Johnson Affidavit.

FORM S 299
REPLACES 6312
AND S 417

AUTOMATED BUSINESS SYSTEMS

DIVISION OF LITTON BUSINESS SYSTEMS, INC.

NOTICE OF CHANGE IN EMPLOYEE STATUS - INCLUDING NOTICE OF LEAVE

DATE	ORIGINATING OFFICE	OFFICE NO.	DIV.	DEPT.	EMPLOYEE NO.	SOCIAL SECURITY NO.	REVIEWED BY	DATE
12/22/69	Rochester		21	70		088-40-3313		

EMPLOYEE NAME: Geraldine Dail

EMPLOYEE'S HOME PHONE NO. (INCLUDE AREA CODE): 716-624-1030

BUSINESS ADDRESS: 785 East Avenue-Rochester, N.Y. 14604

HOME ADDRESS: 330 Kavanaugh Road-Honeoye Falls, N.Y.

STREET / CITY / STATE AND ZIP CODE

NAME AND/OR ADDRESS CHANGE

CHANGE NAME TO:

CHANGE ADDRESS TO:

MARITAL STATUS - CHANGE TO:

STATION NO.

OCCUPATION - DEPT. OR DIV. - SALARY CHANGE. EXEMPT ☐ NON-EX. ☐

OCCUPATION CHANGE	CHANGE OCCUPATION FROM	TO
DEPT. OR DIVISION CHANGE	CHANGE DEPT. OR DIV. FROM	TO
SALARY CHANGE	CHANGE SALARY FROM: $ 260.00 PER HR. WK. B/W S/M MO. YR. (CIRCLE APPLICABLE PAY PERIOD)	TO: $ 275.00 PER HR. WK. B/W S/M MO. YR. (CIRCLE APPLICABLE PAY PERIOD)

DATE LAST INCREASE	AMT. LAST INC. BASE	REASON FOR LAST INCREASE	EFFECTIVE DATE THIS CHANGE	REASON FOR THIS CHANGE
12/1/69			12/1/70	

LOCATION CHANGE - TRANSFER OUT - PAYROLL LOCATION CHANGE

CHANGE LOCATION TO: EFFECTIVE DATE: SALARY PAID THROUGH (DATE):

CHANGE PAYROLL LOCATION TO:

NOTICE OF LEAVE

REASON FOR LEAVE - CHECK ✓: SICKNESS OR DISABILITY ☐ | WORKMAN'S COMP. ☐ | MATERNITY ☐ | MILITARY ☐ | JURY DUTY ☐ | PERSONAL ☐ | OTH. ☐

DATE EMPLOYED | LAST DAY WORKED | DATE RET'D. TO WORK

GRANTED WITH PAY		GRANTED WITHOUT PAY	
FROM	TO	FROM	TO
EXTENSION GRANTED WITH PAY		EXTENSION GRANTED WITHOUT PAY	
FROM	TO	FROM	TO

NECESSARY ACCOMPANYING PAPERS (UNDERSCORE)

1. SICKNESS, MATERNITY - DOCTORS NOTE
2. JURY DUTY - NOTICE TO APPEAR, CERT. OF ATTENDANCE
3. PERSONAL - WRITTEN REQUEST FROM EMPLOYEE
4. MILITARY - ORDERS, DISCHARGE, ETC.
5. WORKMAN'S COMPENSATION - INSURANCE COMPANY FORMS

TERMINATION NOTICE

SAL. TO BE PAID THROUGH | INCLUDING PAY FOR: (SHOW NO. OF DAYS FOR EACH CATEGORY) VACATION - NO. DAYS ____ SEVERANCE - NO. DAYS ____ IN LIEU OF NOTICE - NO. DAYS ____ | LAST DAY WORKED

TERMINATION VOLUNTARY ☐ | TERMINATION INVOLUNTARY ☐ | TERMINATION BY MUTUAL AGREEMENT ☐ | RE-EMPLOYMENT RECOMMENDED ☐ | RE-EMPLOYMENT NOT RECOMMENDED ☐

INDICATE EXCELLENT GOOD, FAIR OR POOR →	PERFORMANCE	ATTITUDE	INITIATIVE	DEPENDABILITY

POSITION AT TERMINATION	DATE EMPLOYED BY CO.	DATE EMPLOYED BY TERMINATING OFFICE	SALARY WHEN TERM'TD.

REASON FOR TERMINATION IN DETAIL:

AUTHORIZATIONS - SIGNATURES REQUIRED

	TITLES		
1.	DISTRICT MANAGER	SERVICE AWARD ☐	COPY DIST. ☐
2.	AREA MANAGER	S/A LIST ☐	TERM. ELEC. FORM ☐
3.		ACCUM. LIST ☐	FRINGE BEN. CDS. ☐
		EMPL. REC. CARD ☐	CONV. TERM. LIT. ☐
		SAL. ADM. ☐	

7. ORIGINATING OFFICE FILE COPY

© 1969 BY AUTOMATED BUSINESS SYSTEMS, ATLANTA, GA.

PRINTED IN U.S.A.

Ex. A-15

Exhibit A — Office Records, A-1 thru A-22 attached to Johnson Affidavit.

FORM S-299
REPLACES B-13
AND B-137

AUTOMATED BUSINESS SYSTEMS
DIVISION OF LITTON INDUSTRIES

NOTICE OF CHANGE IN EMPLOYEE STATUS - INCLUDING NOTICE OF LEAVE

DATE	ORIGINATING OFFICE	OFFICE NO.	DIV.	DEPT.	EMPLOYEE NO.	SOCIAL SECURITY NO.	REVIEWED BY	DATE
4 15 71	Rochester		21	00		066-40-[illegible]3		

EMPLOYEE NAME: Geraldine Dell

EMPLOYEE'S HOME PHONE NO. (AREA CODE): (716) 624-1020

BUSINESS ADDRESS: 550 Main Street, Rochester, New York 14604 (STREET / CITY / STATE AND ZIP CODE)

HOME ADDRESS: 330 Kavanaugh Road, Honeoye Falls, New York 14472 (STREET / CITY / STATE AND ZIP CODE)

NAME AND/OR ADDRESS CHANGE

CHANGE NAME TO:

CHANGE ADDRESS TO:

MARITAL STATUS - CHANGE TO:

PENSION NO.

OCCUPATION - DEPT. OR DIV. - SALARY CHANGE. EXEMPT ☐ NON-EX. ☐

	CHANGE FROM	TO
OCCUPATION CHANGE		
DEPT. OR DIVISION CHANGE		
SALARY CHANGE	$ 275.00 PER HR. WK. B/W S/M MO. YR. (CIRCLE APPLICABLE PAY PERIOD)	$ 286.00 PER HR. WK. B/W S/M MO. YR. (CIRCLE APPLICABLE PAY PERIOD)

DATE LAST INCREASE	AMT. LAST INCREASE	REASON FOR LAST INCREASE	EFFECTIVE DATE THIS CHANGE	REASON FOR THIS CHANGE
12/1/70	$15 wk	Excellent work habits&cooperation	7/1/71	/Continued response to work extra hard.

LOCATION CHANGE - TRANSFER OUT - PAYROLL LOCATION CHANGE

CHANGE LOCATION TO: EFFECTIVE DATE: SALARY PAID THROUGH (DATE):

CHANGE PAYROLL LOCATION TO:

NOTICE OF LEAVE

REASON FOR LEAVE - CHECK ✓: SICKNESS OR DISABILITY ☐ WORKMAN'S COMP. ☐ MATERNITY ☐ MILITARY ☐ JURY DUTY ☐ PERSONAL ☐ OTH. ☐

DATE EMPLOYED | LAST DAY WORKED | DATE RET'D. TO WORK

GRANTED WITH PAY: FROM TO

GRANTED WITHOUT PAY: FROM TO

EXTENSION GRANTED WITH PAY: FROM TO

EXTENSION GRANTED WITHOUT PAY: FROM TO

NECESSARY ACCOMPANYING PAPERS (UNDERSCORE)

1. SICKNESS, MATERNITY - DOCTORS NOTE
2. JURY DUTY - NOTICE TO APPEAR, CERT. OF ATTENDANCE
3. PERSONAL - WRITTEN REQUEST FROM EMPLOYEE
4. MILITARY - ORDERS, DISCHARGE, ETC.
5. WORKMAN'S COMPENSATION - INSURANCE COMPANY FORMS

TERMINATION NOTICE

SAL. TO BE PAID THROUGH | INCLUDING PAY FOR: (SHOW NO. OF DAYS FOR EACH CATEGORY) VACATION - NO. DAYS ____ SEVERANCE - NO. DAYS ____ IN LIEU OF NOTICE - NO. DAYS ____ | LAST DAY WORKED

TERMINATION VOLUNTARY ☐ TERMINATION INVOLUNTARY ☐ TERMINATION BY MUTUAL AGREEMENT ☐ RE EMPLOYMENT RECOMMENDED ☐ RE-EMPLOYMENT NOT RECOMMENDED ☐

INDICATE EXCELLENT, GOOD, FAIR OR POOR →	PERFORMANCE	ATTITUDE	INITIATIVE	DEPENDABILITY

POSITION AT TERMINATION	DATE EMPLOYED BY CO.	DATE EMPLOYED BY TERMINATING OFFICE	SALARY WHEN TERM'T'D.

REASON FOR TERMINATION IN DETAIL

AUTHORIZATIONS SIGNATURES REQUIRED

	TITLES		
1	District Manager	SERVICE AWARD ☐	COPY DIST. ☐
2	Area Manager	S/A LIST ☐	TERM. ELEC. FORM ☐
3	Vice President, Marketing	ACCUM. LIST ☐	FRINGE BEN. CDS. ☐
		EMPL. REC. CARD ☐	CONV. TERM. L/T. ☐
		SAC ADM. ☐	

7. ORIGINATING OFFICE FILE COPY

LITTON BUSINESS SYSTEMS, INC. W11757B PRINTED IN U.S.A.

Ex. A-16

Exhibit A — Office Records, A-1 thru A-22 attached to Johnson Affidavit.

FORM S-219
REPLACES #313
AND #437

AUTOMATED BUSINESS SYSTEMS
DIVISION OF LITTON INDUSTRIES

NOTICE OF CHANGE IN EMPLOYEE STATUS - INCLUDING NOTICE OF LEAVE

DATE	ORIGINATING OFFICE	OFFICE NO. / DIV / DEPT.	EMPLOYEE NO.	SOCIAL SECURITY NO	REVIEWED BY	DATE
5 / 3 / 72	Rochester	1-70		205-40-2313		

EMPLOYEE NAME: Geraldine Dell

EMPLOYEE'S HOME PHONE NO. (INCLUDE AREA CODE): (716) 624-1320

BUSINESS ADDRESS: 350 Main Street East, Rochester, New York 14604 (STREET / CITY / STATE AND ZIP CODE)

HOME ADDRESS: 330 Kavanaugh Road, Honeoye Falls, New York 14472 (STREET / CITY / STATE AND ZIP CODE)

NAME AND/OR ADDRESS CHANGE

CHANGE NAME TO	CHANGE ADDRESS TO
MARITAL STATUS - CHANGE TO	PENSION NO.

OCCUPATION - DEPT. OR DIV. - SALARY CHANGE. EXEMPT ☐ NON-EX. ☐

	CHANGE FROM	TO
OCCUPATION CHANGE	CHANGE OCCUPATION FROM	TO
DEPT. OR DIVISION CHANGE	CHANGE DEPT. OR DIV. FROM	TO
SALARY CHANGE	CHANGE SALARY FROM: $ 236.00 PER HR. WK. B/W S/M MO. YR. (CIRCLE APPLICABLE PAY PERIOD)	TO: $ _____ PER HR. WK. B/W S/M MO. YR. (CIRCLE APPLICABLE PAY PERIOD)

DATE LAST INCREASE	AMT. LAST INCREASE	REASON FOR LAST INCREASE	EFFECTIVE DATE THIS CHANGE	REASON FOR THIS CHANGE
7/1/71	11.00/2M			

LOCATION CHANGE - TRANSFER OUT - PAYROLL LOCATION CHANGE

CHANGE LOCATION TO: | EFFECTIVE DATE | SALARY PAID THROUGH (DATE)

CHANGE PAYROLL LOCATION TO:

NOTICE OF LEAVE

REASON FOR LEAVE - CHECK ✓: SICKNESS OR DISABILITY ☐ | WORKMAN'S COMP. ☐ | MATERNITY ☐ | PART. ☐ | JURY DUTY ☐ | PERSONAL ☐ | OTH. ☐

DATE EMPLOYED	LAST DAY WORKED	DATE RET'D. TO WORK

GRANTED WITH PAY	GRANTED WITHOUT PAY
FROM ____ TO ____	FROM ____ TO ____
EXTENSION GRANTED WITH PAY	EXTENSION GRANTED WITHOUT PAY
FROM ____ TO ____	FROM ____ TO ____

NECESSARY ACCOMPANYING PAPERS (UNDERSCORE)

1. SICKNESS, MATERNITY - DOCTORS NOTE
2. JURY DUTY - NOTICE TO APPEAR, CERT. OF ATTENDANCE
3. PERSONAL - WRITTEN REQUEST FROM EMPLOYEE
4. MILITARY - ORDERS, DISCHARGE, ETC.
5. WORKMAN'S COMPENSATION - INSURANCE COMPANY FORMS

TERMINATION NOTICE

SAL. TO BE PAID THROUGH	INCLUDING PAY FOR: (SHOW NO. OF DAYS FOR EACH CATEGORY)	LAST DAY WORKED
	VACATION - NO. DAYS ____ SEVERANCE - NO. DAYS ____ IN LIEU OF NOTICE - NO. DAYS ____	

TERMINATION VOLUNTARY ☐ | TERMINATION INVOLUNTARY ☐ | TERMINATION BY MUTUAL AGREEMENT ☐ | RE-EMPLOYMENT RECOMMENDED ☐ | RE-EMPLOYMENT NOT RECOMMENDED ☐

INDICATE EXCELLENT, GOOD, FAIR OR POOR →	PERFORMANCE	ATTITUDE	INITIATIVE	DEPENDABILITY

POSITION AT TERMINATION	DATE EMPLOYED BY CO.	DATE EMPLOYED BY TERMINATING OFFICE	SALARY WHEN TERM'TD.

REASON FOR TERMINATION IN DETAIL

AUTHORIZATIONS - SIGNATURES REQUIRED / TITLES

1. _____ — District Manager
2. _____ — Area Manager
3. _____ — Vice President-Marketing

SERVICE AWARD ☐ | S/A LIST ☐ | ACCUM. LIST ☐ | EMPL. REC. CARD ☐ | SAL. ADM. ☐

COPY DIST. ☐ | TERM. ELEC. FORM ☐ | FRINGE BEN. CDS. ☐ | CONV. TERM. LIT. ☐

7. ORIGINATING OFFICE FILE COPY

LITTON BUSINESS SYSTEMS, INC. W117578 PRINTED IN U.S.A.

Ex. A-17

Exhibit A — Office Records, A-1 thru A-22 attached to Johnson Affidavit.

FORM S-439 REPLACES 9313 AND B-437

LITTON ABS
Litton Automated Business Systems

NOTICE OF CHANGE IN EMPLOYEE STATUS - INCLUDING NOTICE OF LEAVE

DATE	ORIGINATING OFFICE	OFFICE NO.	DIV.	DEPT.	EMPLOYEE NO.	SOCIAL SECURITY NO.	REVIEWED BY: DATE
8 31 72	Rochester	21	70			066-40-2313	

EMPLOYEE NAME: Geraldine Dell

EMPLOYEE'S HOME PHONE NO. (INCLUDE AREA CODE): (716) 624-1020

BUSINESS ADDRESS: 255 No. Goodman Street, Rochester, New York (STREET / CITY / STATE AND ZIP CODE)

HOME ADDRESS: 330 Kavanaugh Road, Honeoye Falls, New York 14472 (STREET / CITY / STATE AND ZIP CODE)

NAME AND/OR ADDRESS CHANGE

CHANGE NAME TO	CHANGE ADDRESS TO
MARITAL STATUS - CHANGE TO	PENSION NO.

OCCUPATION - DEPT. OR DIV. - SALARY CHANGE. . EXEMPT ☐ NON-EX ☐

OCCUPATION CHANGE	CHANGE OCCUPATION FROM: Secretary	TO: ELS Installation Supervisor
DEPT. OR DIVISION CHANGE	CHANGE DEPT. OR DIV. FROM: Sales	TO: Systems Department
SALARY CHANGE	CHANGE SALARY FROM: $ 314.00 PER HR. WK. B/W S/M MO. YR. (CIRCLE APPLICABLE PAY PERIOD)	TO: $ 336.00 PER HR. WK. B/W S/M MO. (CIRCLE APPLICABLE PAY PERIOD)

DATE LAST INCREASE	AMT. LAST INCREASE	REASON FOR LAST INCREASE	EFFECTIVE DATE THIS CHANGE	REASON FOR THIS CHANGE
7/1/72	28.00/mo	annual review	11/16/72	Change in Salary Grade and Occupation

LOCATION CHANGE - TRANSFER OUT - PAYROLL LOCATION CHANGE

CHANGE LOCATION TO: | EFFECTIVE DATE | SALARY PAID THROUGH (DATE)

CHANGE PAYROLL LOCATION TO:

NOTICE OF LEAVE

REASON FOR LEAVE - CHECK ✓: SICKNESS OR DISABILITY ☐ | WORKMAN'S COMP ☐ | MATERNITY ☐ | MILITARY ☐ | JURY DUTY ☐ | PERSONAL ☐ | OTH. ☐

DATE EMPLOYED | LAST DAY WORKED | DATE RET'D. TO WORK

GRANTED WITH PAY	GRANTED WITHOUT PAY
FROM TO	FROM TO
EXTENSION GRANTED WITH PAY	EXTENSION GRANTED WITHOUT PAY
FROM TO	FROM TO

NECESSARY ACCOMPANYING PAPERS (UNDERSCORE)

1. SICKNESS, MATERNITY - DOCTORS NOTE
2. JURY DUTY - NOTICE TO APPEAR, CERT. OF ATTENDANCE
3. PERSONAL - WRITTEN REQUEST FROM EMPLOYEE
4. MILITARY - ORDERS, DISCHARGE, ETC.
5. WORKMAN'S COMPENSATION - INSURANCE COMPANY FORMS

TERMINATION NOTICE

SAL. TO BE PAID THROUGH | INCLUDING PAY FOR: (SHOW NO. OF DAYS FOR EACH CATEGORY) VACATION - NO. DAYS ____ SEVERANCE - NO. DAYS ____ IN LIEU OF NOTICE - NO. DAYS ____ | LAST DAY WORKED

TERMINATION VOLUNTARY ☐ | TERMINATION INVOLUNTARY ☐ | TERMINATION BY MUTUAL AGREEMENT ☐ | RE-EMPLOYMENT RECOMMENDED ☐ | RE-EMPLOYMENT NOT RECOMMENDED ☐

INDICATE EXCELLENT, GOOD, FAIR OR POOR →	PERFORMANCE	ATTITUDE	INITIATIVE	DEPENDABILITY

POSITION AT TERMINATION	DATE EMPLOYED BY CO.	DATE EMPLOYED BY TERMINATING OFFICE	SALARY WHEN TERM'T'D.

REASON FOR TERMINATION IN DETAIL

AUTHORIZATIONS - SIGNATURES REQUIRED | TITLES

1. _____ _____
2. _____ _____
3. _____ _____

SERVICE AWARD ☐ | COPY DIST. ☐
S/A LIST ☐ | TERM. ELEC. FORM ☐
ACCUM. LIST ☐ | FRINGE BEN. CDS. ☐
EMPL. REC. CARD ☐ | CONV. TERM. LIT. ☐
SAL. ADM. ☐

7. ORIGINATING OFFICE FILE COPY

Ex. A-18

Exhibit A — Office Records, A-1 thru A-22
attached to Johnson Affidavit.

FORM S-299
REPLACES B313
AND B-437

LITTON ABS
Litton Automated Business Systems

NOTICE OF CHANGE IN EMPLOYEE STATUS - INCLUDING NOTICE OF LEAVE

DATE	ORIGINATING OFFICE	OFFICE NO. / DIV. / DEPT.	EMPLOYEE NO.	SOCIAL SECURITY NO.	REVIEWED BY / DATE
7 20 73	Rochester	21 70		066-40-2313	

EMPLOYEE NAME: Geraldine Dell

EMPLOYEE'S HOME PHONE NO. (INCLUDE AREA CODE): (716) 624-1020

BUSINESS ADDRESS: 255 N. Goodman Street, Rochester, New York (STREET / CITY / STATE AND ZIP CODE)

HOME ADDRESS: 330 Kavanaugh Road, Honeoye Falls, New York 14472 (STREET / CITY / STATE AND ZIP CODE)

NAME AND/OR ADDRESS CHANGE

CHANGE NAME TO:

CHANGE ADDRESS TO:

MARITAL STATUS - CHANGE TO:

PENSION NO.:

OCCUPATION - DEPT. OR DIV. - SALARY CHANGE. EXEMPT ☐ NON-EX. ☐

OCCUPATION CHANGE	CHANGE OCCUPATION FROM:	TO:
DEPT. OR DIVISION CHANGE	CHANGE DEPT. OR DIV. FROM:	TO:
SALARY CHANGE	CHANGE SALARY FROM: $ _____ PER HR. WK. B/W S/M MO. YR. CIRCLE APPLICABLE PAY PERIOD	TO: $ _____ PER HR. WK. B/W S/M MO. YR. CIRCLE APPLICABLE PAY PERIOD
	DATE LAST INCREASE / AMT. LAST INCREASE / REASON FOR LAST INCREASE	EFFECTIVE DATE THIS CHANGE / REASON FOR THIS CHANGE

LOCATION CHANGE - TRANSFER OUT - PAYROLL LOCATION CHANGE

CHANGE LOCATION TO: / EFFECTIVE DATE / SALARY PAID THROUGH (DATE)

CHANGE PAYROLL LOCATION TO:

NOTICE OF LEAVE

REASON FOR LEAVE - CHECK ✓: SICKNESS OR DISABILITY ☐ WORKMAN'S COMP. ☐ MATERNITY ☐ MILITARY ☐ JURY DUTY ☐ PERSONAL ☐ OTH. ☐

DATE EMPLOYED / LAST DAY WORKED / DATE RET'D. TO WORK

GRANTED WITH PAY: FROM ____ TO ____	GRANTED WITHOUT PAY: FROM ____ TO ____
EXTENSION GRANTED WITH PAY: FROM ____ TO ____	EXTENSION GRANTED WITHOUT PAY: FROM ____ TO ____

NECESSARY ACCOMPANYING PAPERS (UNDERSCORE)

1. SICKNESS, MATERNITY - DOCTORS NOTE
2. JURY DUTY - NOTICE TO APPEAR, CERT. OF ATTENDANCE
3. PERSONAL - WRITTEN REQUEST FROM EMPLOYEE
4. MILITARY - ORDERS, DISCHARGE, ETC.
5. WORKMAN'S COMPENSATION - INSURANCE COMPANY FORMS

TERMINATION NOTICE

SAL. TO BE PAID THROUGH: 7/20/73

INCLUDING PAY FOR: (SHOW NO. OF DAYS FOR EACH CATEGORY) VACATION - NO. DAYS 5 SEVERANCE - NO. DAYS 0 IN LIEU OF NOTICE - NO. DAYS 0

LAST DAY WORKED: 7/20/73

TERMINATION VOLUNTARY ☒ TERMINATION INVOLUNTARY ☐ TERMINATION BY MUTUAL AGREEMENT ☐ RE-EMPLOYMENT RECOMMENDED ☒ RE-EMPLOYMENT NOT RECOMMENDED ☐

INDICATE EXCELLENT GOOD, FAIR OR POOR →	PERFORMANCE	ATTITUDE	INITIATIVE	DEPENDABILITY
	Good	Good	Good	Good

POSITION AT TERMINATION: Sales Trainee | DATE EMPLOYED BY CO.: 2/12/68 | DATE EMPLOYED BY TERMINATING OFFICE: 2/12/68 | SALARY WHEN TERM'TD.: $[illegible]

REASON FOR TERMINATION IN DETAIL: Resigned to accept [illegible]

AUTHORIZATIONS - SIGNATURES REQUIRED / TITLES

1. [signature] [illegible]
2. [signature] [illegible]
3. [signature] [illegible]

SERVICE AWARD ☒ COPY DIST. ☒
S/A LIST ☐ TERM. ELEC. FORM ☐
ACCUM. LIST ☐ FRINGE BEN. CDS. ☐
EMPL. REC. CARD ☒ CONV. TERM. LIT. ☐
SAL. ADM. ☒ C-6-8-73

7. ORIGINATING OFFICE FILE COPY

PRINTED IN U.S.A.

Ex. A-19

Exhibit A — Office Records, A-1 thru A-22
attached to Johnson Affidavit.

55-1
217

MAR 2 6 1976

LITTON ABS
Automated Business Systems
Litton CARLSTADT, NEW JERSEY

Nº 06914

NATIONAL NEWARK & ESSEX BANK
FAIRFIELD, N. J.

Resume Paying Bank

PAY TO THE ORDER OF

LITTON BUSINESS SYSTEMS, INC.

G. Dell

DATE JUL 27 1973

Thomas A Drach

⑈0217⑈000⑈ ⑆0715⑆26926⑈ ⑈00000 23969⑈

1-120
NEW YORK
1-120

PAY ANY BANK OR
BANKER

2-15 16 215

Ex. A-20

Exhibit A — Office Records, A-1 thru A-22 attached to Johnson Affidavit.

MAR 2 6 1976

55-1
217

LITTON LABS
Litton CARLSTADT, NEW JERSEY

Nº 07942

NATIONAL NEWARK & ESSEX BANK
FAIRFIELD, N J

PAY TO THE ORDER OF

LITTON BUSINESS SYSTEMS, INC.

DATE AUG 2 8 1973

C. Dell

Thomas A Drach

⑆0217⑆0001⑆ 0714⑆08926⑈ ⑈00000 23969⑈

⑆0217⑆0001⑆ 0714⑆08926⑈ ⑈00000 23969⑈

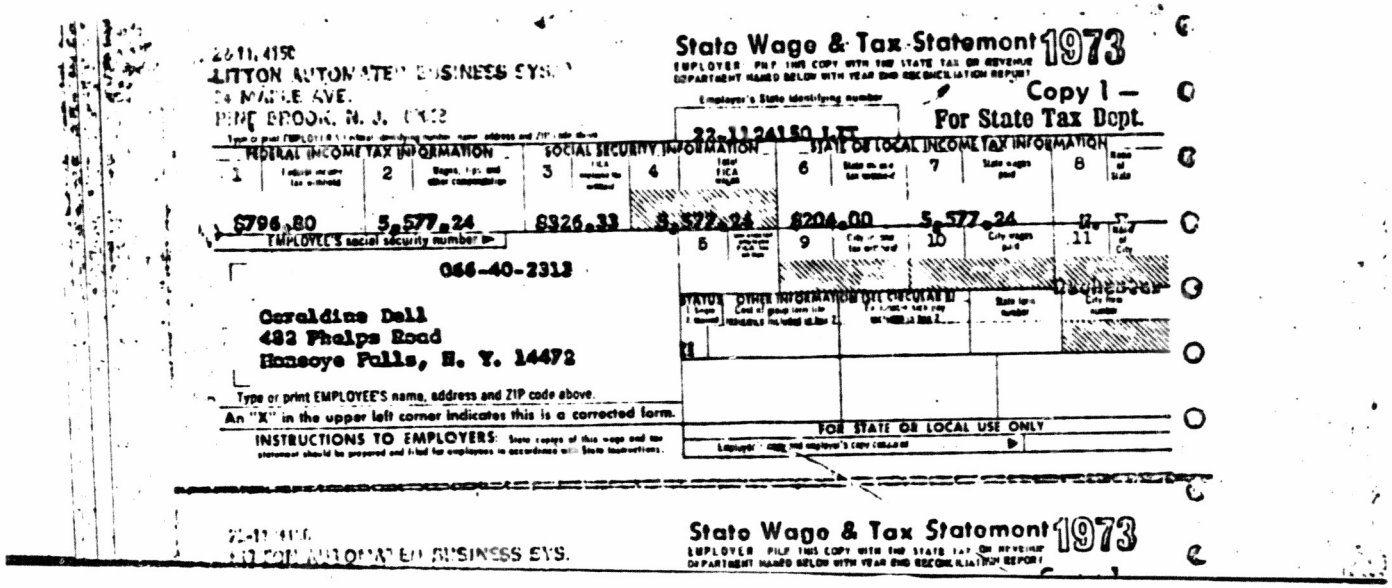
C. Dell

PAY ANY BANK P.G.
NORTHERN TRUST CO.
CHICAGO

2-15 16 2-15

Ex. A-21

Exhibit A — Office Records, A-1 thru A-22 attached to Johnson Affidavit.



2611.415C
LITTON AUTOMATED BUSINESS SYS.
24 MAPLE AVE.
PINE BROOK, N. J. 07058

State Wage & Tax Statement 1973

EMPLOYER: FILE THIS COPY WITH THE STATE TAX OR REVENUE DEPARTMENT NAMED BELOW WITH YEAR END RECONCILIATION REPORT

Copy 1 — For State Tax Dept.

Employer's State identifying number: 22-1124150 LFT

FEDERAL INCOME TAX INFORMATION		SOCIAL SECURITY INFORMATION		STATE OR LOCAL INCOME TAX INFORMATION			
1	2	3	4	6	7	8	
$796.80	$5,577.24	$926.33	$5,577.24	$204.00	$5,577.24		

EMPLOYEE'S social security number: 066-40-2313

Geraldine Dell
482 Phelps Road
Honeoye Falls, N. Y. 14472

Type or print EMPLOYEE'S name, address and ZIP code above.

An "X" in the upper left corner indicates this is a corrected form.

INSTRUCTIONS TO EMPLOYERS: State copies of this wage and tax statement should be prepared and filed for employees in accordance with State instructions.

FOR STATE OR LOCAL USE ONLY

2611.415C
LITTON AUTOMATED BUSINESS SYS.

State Wage & Tax Statement 1973

EMPLOYER: FILE THIS COPY WITH THE STATE TAX OR REVENUE DEPARTMENT NAMED BELOW WITH YEAR END RECONCILIATION REPORT

Ex. A-22

Exhibit B – Memorandum of Telephone Conversation attached to Johnson affidavit.

Jim Livingston - Boston

Gerry Dell - Rochester

July 16, 1973

Resignation

Jim, per our telephone conversation of today I am resigning my position as Installation Supervisor as of August 31st. I have been accepted at Monroe Community College and will start September 4th as a full time student.

I want to express my appreciation to you for all of the help you have given me with my job, it would have been much more difficult without your constant support.

Sincerely,

Gerry

Gerry Dell

/gd

cc: J. Ritter
B. Penrod

Ex. B

Exhibit C – Complaint and an Amendment to the Complaint (C-1 and C-2) attached to Johnson Affidavit.

STATE OF NEW YORK : EXECUTIVE DEPARTMENT

STATE DIVISION OF HUMAN RIGHTS
on the complaint of

GERALDINE SEVOR
Complainant

against

LITTON SYSTEMS, A DIVISION OF LITTON [illegible]
Respondent

COMPLAINT NO. [illegible]

I, Geraldine Sevor
residing at 76 Henrietta Street, Rochester, New York 14620 Tel No.
charge the above-named respondent

whose address is 255 North Goodman Street, Rochester, New York 14607 Tel No.
with an unlawful discriminatory practice relating to employment on or about March 1973 and continuing
by discriminating against me in violation of Section 296 of the Human Rights Law

because of my AGE ( ), RACE ( ), CREED ( ), COLOR ( ), NATIONAL ORIGIN ( ), SEX (XX).
The particulars are:

1. I had worked for Litton Industries for nine years before leaving to attend college full-time in 1972. At that time I was assured that I had been an excellent employee and I was urged to return to the company at anytime in the future.

2. I was approached in approximately October 1974 by Dan Johnson of Litton Industries, who offered me a position as Outside Sales Person. He stressed my job knowledge and ability, as a result of which I resigned my present job and signed a contract with Litton Industries in December 1974. Mr. Johnson explained that I would be sent to a training school in New Jersey for three weeks. I had spoken with the Head of the training school and all arrangements had been made for me to leave January 19, 1975.

3. On January 16, 1975 Mr. Johnson called and told me I had been "scratched" as a result of a cutback. I asked for a further explanation and he said I was not to be hired because I lacked sales experience.

4. On or about the next day, January 17, 1975, I talked with Joseph Behan, an employee of Litton Industries. Mr. Behan said that Dave Miller, the man I would have been working under, had said that he would prefer to work with a man. He said he had also been told that the Regional Manager, William Peck, did not want to take a chance on another woman because two previous women employees in the Buffalo area had not worked out.

5. The respondent company allowed me to resign my job at the Genesee Regional Health Planning Council and to drop out of college without offering me any compensation of any kind, even though a secretary in the Buffalo Office said that she knew two days before Xmas. that I was not to be hired.

6. On information and belief, "Keith" was hired in my place and sent to the training school in New Jersey. In spite of the fact I was told my lack of sales experience was the reason I was not hired, on information and belief, "Keith" had no experience in sales other than about two months.

Rochester Bus
work Sept 73
To Jan 75

Ex. C-1

BEST COPY AVAILABLE

Exhibit C — Complaint and an Amendment to the Complaint (C-1 and C-2) attached to Johnson Affidavit.

Page No. 2

7. In or about March 1973 while I was working as an Installer, I was offered a sales position by Jack [illegible]nitter, then District Manager. I refused at that time because he offered me $8600.00 a year salary which I knew was far below what a man would have been offered.

8. I believe I have been denied equal terms, conditions and privileges of employment and discriminated against in employment because of my sex. I believe that the respondent's reason for breaking their contract with me was a subterfuge to discriminate against me because of my sex. I have been damaged and humiliated by this unlawful discrimination and have suffered serious financial damage.

9. I am a woman. Based on the foregoing, I charge the respondent with an unlawful discriminatory practice relating to employment, because of my sex, in violation of Section 296 of the New York Human Rights Law.

3. [illegible] of the unlawful discriminatory practice of respondent as herein alleged, complainant has already suffered damages in the sum of $ UNSPECIFIED

4. [illegible] not commenced any civil, criminal or administrative action or proceeding in any court or administrative agency based upon the same grievance.

STATE OF NEW YORK)
COUNTY OF [illegible]) ss:

(Signature of Complainant)

[illegible], being duly sworn, deposes and says: that she is the Complainant herein, that she has read the foregoing complaint and knows the contents thereof, that the same is true of her own knowledge except as to the matters therein stated on information and belief; and that as those matters she believes the same to be true.

Ex. C-1

Exhibit C — Complaint and an Amendment to the Complaint (C-1 and C-2) attached to Johnson Affidavit.

RECEIVED
MAR 28 1975
REGIONAL DIRECTOR

STATE OF NEW YORK : EXECUTIVE DEPARTMENT

STATE DIVISION OF HUMAN RIGHTS ON THE COMPLAINT OF

GERALDINE SEVOR
76 Henrietta Street
Rochester, New York 14620

Complainant,

-against-

McBEE SYSTEMS, a Subsidiary of Litton Industries

Respondent.

AMENDMENT TO THE COMPLAINT NUMBER VI-CS-2885-75

Pursuant to the provisions of Section 297 of the Executive Law of the State of New York, complainant hereby amends her complaint of discrimination sworn to February 24, 1975 as follows:

1. Paragraph numbered one of the Complaint, sentence one, shall read:

"I had worked for Litton Industries for nine years before leaving to attend college full-time in 1973."

2. Paragraph numbered five of the complaint shall read as follows:

"The respondent company allowed me to resign my job at the Genesee Regional Health Planning Council and to drop out of college without offering me any compensation of any kind, even though a secretary in the Buffalo Office said (told another person who in turn told another person who told me) that she knew two days before Xmas, that I was not to be hired."

3. There shall be added to the complaint a paragraph numbered 8A as follows:

I believe that the foregoing acts of the respondent to discriminate against me by denying me equal terms, conditions and privileges of employment and terminating my employment because of sex are a part of a pattern, practice, custom and usage of discrimination engaged in by the respondent on the basis of a person's sex.

Ex. C-2

Exhibit C — Complaint and an Amendment to the Complaint (C-1 and C-2) attached to Affidavit

4. There shall be added to the complaint a paragraph numbered 8B as follows:

> In addition to the embarassment and humiliation caused to me by the discriminatory and illegal acts of the respondent, the acts of the respondent have caused me physical illness. I have been required to seek medical care because of respondent's discriminatory and illegal acts. I have experienced much pain and suffering of body and mind because of respondent's discriminatory and illegal acts.

Geraldine Sevor
Geraldine Sevor

EX. C-2

Exhibit C — Complaint and an Amendment to the Complaint (C-1 and C-2) attached to Johnson Affidavit.

STATE OF NEW YORK)
COUNTY OF MONROE) SS:

Geraldine Sevor, being duly sworn, deposes and says:

That she is the complainant herein; that she has read the foregoing complaint and knows the contents thereof; that the same is true to her own knowledge except that as to the matters therein stated on information and belief and that as to those matters she believes the same to be true.

Geraldine Sevor
Geraldine Sevor

Subscribed and sworn to before
me this 28th day of March, 1975.

Notary Public

EMMELYN LOGAN-BALDWIN
NOTARY PUBLIC, State of N. Y., Monroe Co.
Commission Expires March 30, 1977.

Ex. C-2

Exhibit D – Notice of Charge of Employment Discrimination attached to Johnson Affidavit.

EQUAL EMPLOYMENT OPPORTUNITY COMMISSION
BUFFALO DISTRICT OFFICE
One W. Genesee St. - Rm. 1020
Buffalo, New York 14202

APR 29 1975

TO: President
Litton Industries, Inc.
McBee Industries, Sub.
255 N. Goodman Street
Rochester, NY 14607

PERSON FILING CHARGE: Geraldine Sevor

THIS PERSON (Check one)
- [X] CLAIMS TO BE AGGRIEVED
- [ ] IS FILING ON BEHALF OF A PERSON CLAIMING TO BE AGGRIEVED
- [ ] IS A COMMISSIONER OF EEOC

DATE OF ALLEGED VIOLATION: February 24, 1975
PLACE OF ALLEGED VIOLATION: Rochester, NY
CHARGE NUMBER: TBU5 0361

NOTICE OF CHARGE OF EMPLOYMENT DISCRIMINATION

(See Notice of Non-retaliation on reverse)

You are hereby notified that a charge of employment discrimination under Section 706 of the Civil Rights Act of 1964, 42 U.S.C. Section 2000e-5, as amended, has been filed against you. Information relating to the date, place, and circumstances of the alleged unlawful employment practices is provided herein.

No action on your part is necessary at this time. However, if you wish to submit any information in writing, it will be made a part of the file and will be considered at the time we investigate this charge. Telephone communications cannot be made a part of the record. Section 1602.14 of the Commission's Regulations (See attachment) requires the preservation of all personnel records relevant to this charge, as described below, until it is resolved.

Because of the Commission's volume of pending work, we are unable to tell you when we can schedule investigation of this charge; we will, however, contact you at the earliest possible date.

BASIS OF DISCRIMINATION → [ ] RACE OR COLOR [X] SEX [ ] RELIGION [ ] NATIONAL ORIGIN

NATURE OF CHARGE

X	HIRING		DISCHARGE		LAYOFF		RECALL
	WAGES		PROMOTION		DEMOTION		SENIORITY
	JOB CLASSIFICATION	X	TRAINING/ APPRENTICESHIP		EXCLUSION		UNION REPRESENTATION
	SEGREGATED LOCALS		REFERRAL		QUALIFICATION/TESTING		ADVERTISING
	BENEFITS		SEGREGATED FACILITIES		INTIMIDATION/ REPRISAL		REPRISAL (USC 704(a) ONLY)
	TERMS AND CONDITIONS		UNSPECIFIED AND OTHER		OTHER (Specify)		

DATE	TYPED NAME OF DISTRICT DIRECTOR	SIGNATURE
4/28/75	Lloyd G. Bell	Lloyd G. Bell

EEOC FORM 131 MAR 74 PREVIOUS EDITIONS OF THIS FORM ARE OBSOLETE RESPONDENT'S COPY

Ex. D

Exhibit E – Notice of Right to Sue attached to Johnson Affidavit.

EQUAL EMPLOYMENT OPPORTUNITY COMMISSION
1 WEST GENESEE STREET
BUFFALO, NEW YORK 14202
(716) 842-5170

Re:

NOTICE OF RIGHT TO SUE
WITHIN 90 DAYS

In Case No.TBU5-0364 before the Equal Employment Opportunity Commission, United States Government.

Geraldine Sevor

v.

Litton Industries, Inc., McBee Industries, Sub.

YOU ARE HEREBY NOTIFIED THAT:

WHEREAS, this Commission has not filed a civil action with respect to your charge as provided by section 706(f)(1) of Title VII of the Civil Rights Act of 1964, as amended, 42 U.S.C. 2000e et seq; and,

WHEREAS, this Commission has not entered into a conciliation agreement to which you are a party;

THEREFORE, pursuant to s706(F) of Title VII, you may within 90 days of your receipt of this Notice, institute a civil action in the United States District Court having jurisdiction over your case.

Should you decide to commence judicial action, you must do so within 90 days of the receipt of this letter or you will lose your right to sue under Title VII.

If you are not represented by counsel and you are unable to obtain counsel, the Court may in its discretion, appoint an attorney to represent you.

Should you have any questions concerning your legal rights or have any difficulty in filing your case in court, please contact Mr. Kenneth M. Davidson of our office at (716) 842-5170.

Lloyd G. Bell
LLOYD G. BELL, DISTRICT DIRECTOR

9/30/75
DATE

Ex. E

DEFENDANTS' AFFIDAVIT OF ANTHONY R. PALERMO, ESQ., sworn to 4-7-76, in Opposition to Motion to Compel Production of Documents and in Support of Motion for Summary Judgment.

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF NEW YORK

GERALDINE SEVOR,
76 Henrietta Street
Rochester, New York 14620

Plaintiff,

-vs-

AFFIDAVIT

LITTON INDUSTRIES
255 North Goodman Street
Rochester, New York 14607

Civ. No. 75-559

and

McBEE SYSTEMS, A Subsidiary of
Litton Industries
255 North Goodman Street
Rochester, New York 14607

Defendants.

STATE OF NEW YORK)
COUNTY OF MONROE) SS.:

ANTHONY R. PALERMO, being duly sworn, deposes and says:

1. I am an attorney admitted to practice in the State of New York and in this Court, and a member of the firm of Brennan, Centner, Palermo & Blauvelt, attorneys retained by Litton Industries, Inc. and Litton Business Systems, Inc. to represent them in the above-entitled matter. This affidavit is submitted in opposition to a motion to compel production of documents and in support of a motion for summary judgment under Rule 56.

2. Upon information and belief, at the same time the summons and complaint were served on David Miller on January 5, 1976, he was also served with a document entitled "First Notice to Produce". A copy of said notice will be handed to the Court on oral argument, if desired. Your deponent requested and received plaintiff's counsel's consent to extend the time in which to answer or move against the complaint until February 10, 1976, and to object or respond to the Notice to Produce until

March 4, 1976. By notice dated February 10, 1976, your deponent caused a motion to dismiss to be made on jurisdictional and other grounds. Thereafter, your deponent requested plaintiff's counsel to stipulate to extend defendants' time to move against or to respond to plaintiff's Notice to Produce until ten (10) days following receipt of a final determination on defendants' motion to dismiss the complaint. A copy of said proposed stipulation is attached hereto. Plaintiff's counsel declined to consent to such stipulation and insisted on compliance with the Notice to Produce.

3. On March 4, 1976, your deponent caused to be served Responses and Objections to Plaintiff's Notice to Produce. A copy of said Responses and Objections will be handed to the Court upon oral argument, if requested. All the objections raised in said Responses are incorporated herein.

4. Your deponent believes plaintiff's Notice to Produce is premature and that justice and practicality dictate that the motion to dismiss be finally determined before defendants are compelled to go to the burden, annoyance and expense of production of records. Until the motion to dismiss is decided, it is impossible to determine which defendant, if any, is required to produce records. Furthermore, it is impossible to decide relevance of documents requested until the Court determines the underlying motion to dismiss.

5. Upon information and belief, plaintiff has already obtained discovery of her own personnel records in connection with a complaint which she filed with the New York State Division of Human Rights.

6. In the event the Court decides to consider matters outside the pleadings which have been presented in connection with the motion to dismiss under Rule 12(b), your deponent

requests the Court to consider the motion as one for summary judgment as to some or all the issues raised and to dispose of the same as provided in Rule 56 of the Federal Rules of Civil Procedure.

7. It is respectfully submitted there are no genuine issues as to (1) whether either defendant Litton Industries, Inc. or McBee Systems, a Division of Kimball Systems, a Division of Litton Business Systems, Inc. have ever been served; (2) whether plaintiff was ever employed by Litton Industries, Inc.; (3) whether plaintiff ever filed timely within 180 days with the EEOC of any charges, other than the failure to hire in January, 1975; and (4) whether timely suit was commenced on Court II relating to an alleged Equal Pay Act violation, i.e., within two (2) years from the date of her effective resignation on August 31, 1973, from Litton Business Systems, Inc.

WHEREFORE, your deponent respectfully requests the Court to grant summary judgment as a matter of law as to all or any part of the matters raised, and in the alternative requests the Court to deny the motion to compel production, or in the further alternative requests the Court to defer consideration of the motion to compel production until decision is rendered on defendants' motion to dismiss the complaint.

Anthony R. Palermo

Anthony R. Palermo

Sworn to before me
this 7th day of
April
1976.

Thomas E. Goldman

Notary Public

Stipulation Extending Time attached to Palermo Affidavit.

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF NEW YORK

GERALDINE SEVOR,

Plaintiff,

-vs-

LITTON INDUSTRIES and MC BEE SYSTEMS, a subsidiary of Litton Industries,

Defendants.

STIPULATION EXTENDING TIME

Civ. No. 75-559

WHEREAS, the plaintiff in the above referenced matter has served a Notice to Produce and Permit Inspection and copying on February 18 and 19, 1976, and

WHEREAS, the parties have entered into a stipulation extending the time to respond to said request to produce documents up to and including March 4, 1976, and,

WHEREAS, a motion to dismiss the actions herein has been made on behalf of the defendants originally returnable February 23, 1976, and,

WHEREAS, said motion has now been adjourned to March 22, 1976 at the request of the plaintiff.

NOW, THEREFORE, IT IS HEREBY STIPULATED AND AGREED by and between the undersigned, attorneys for plaintiff and defendants, that defendant's time to move or to respond to plaintiff's request to produce documents be extended to and including ten (10) days following receipt of notice of a final

Stipulation Extending Time
attached to Palermo Affidavit.

determination on defendant's motion to dismiss the complaint pursuant to Rule 12 of the Federal Rules of Procedure.

Dated: March 1, 1976

EMMELYN S. LOGAN-BALDWIN, ESQ.

By: _____
Attorney for Plaintiff
510 Powers Building
Rochester, New York 14614
Tel. 716-232-2292

BRENNAN, CENTNER, PALERMO & BLAUVELT

By: _____
Anthony R. Palermo, Esq.
Attorneys for Defendants
500 Reynolds Arcade Building
Rochester, New York 14614
Tel. 716-546-6474

SO ORDERED this day

of , 1976.

_____
U.S.D.J.

PLAINTIFF'S SUPPLEMENTAL AFFIRMATION OF EMMELYN LOGAN-BALDWIN, ESQ., dated 4-9-76, in Support of Cross-Motion to Compel Discovery and in Opposition to Motion to Dismiss.

UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF NEW YORK

GERALDINE SEVOR, Plaintiff -vs- LITTON INDUSTRIES, INC., LITTON BUSINESS SYSTEMS, INC. and MCBEE SYSTEMS, Defendants.	SUPPLEMENTAL AFFIRMATION IN SUPPORT OF CROSS-MOTION TO COMPEL DISCOVERY; OPPOSITION TO DEFENDANTS' MOTION TO DISMISS

Emmelyn Logan-Baldwin, under penalties of perjury, affirms the following:

1. I am an attorney at law duly licensed to practice my profession in the State of New York. I am the attorney for the plaintiff in this action. I am familiar with the pleadings and proceedings herein. This affirmation is submitted in further support of plaintiff's cross-motion to compel discovery and in opposition to defendants' motion to dismiss.

2. The affidavit of David Miller, dated March 25, 1976 and submitted to the court is more significant for what it does not say than for what it does state. Nowhere does Mr. Miller address himself to the point raised in plaintiff's previous papers that he was, on January 5, 1976, when process was served herein on him, the manager of the Rochester, New York situs of the Litton Industries, Inc. operations. Mr. Miller, in fact, held himself out to the United States Marshal as the branch manager for Litton Industries, Inc.; the United

States Marshal, so indicated on his return of service previously submitted to the court in plaintiff's papers herein.

3. Nor does Mr. Miller deny that he previously accepted process on behalf of Litton Industries, Inc. in proceedings before the New York State Division of Human Rights. It is true, as Mr. Johnson points out in his affidavit of March 31, 1976, submitted to the court, that the particular caption in the Division proceedings referred to McBee Systems, a subsidiary of Litton Industries, Rochester, New York. However, as plaintiff has previously pointed out in her papers to the court, question arose as to who was being sued in that proceeding. The entity that appeared in those proceedings was Litton Industries, Inc. The documents requested covered documents in the control of Litton Industries, Inc. and its variously described subsidiaries and/or divisions. Mr. Miller represented to Division representatives at a confrontation conference that he was in charge of the Rochester office; as previously noted in previous papers, there has been no challenge to process which was served on Mr. Miller in the Division proceedings as that process related to documents in the control of Litton Industries, Inc. and/or its various divisionsand/or subsidiaries.

4. Defendants seem to be raising for the first time in their most recently served papers objection to service of process on all defendants-not just objection to service on Litton Industries, Inc. as in previous papers. For the reasons

previously set forth in plaintiff's previous papers and for the reasons hereinafter more fully stated, such an objection is not well taken since Litton Industries does do business in the State of New York and has been properly served by the service of process on Mr. Miller who held himself out as a branch manager authorized to receive process. However, if there should be any question as to the proper person with the proper authority being served, the court should not dismiss as defendants request but should allow additional time for service to be made on the authorized agent of the defendants.

5. Plaintiff has already caused additional summonses, complaints and notices to produce to be forwarded to the United States Marshal for service on Dan Johnson who represents himself to the court as a person authorized to receive process on behalf of all defendants. Mr. Miller swears that he sent the process he received immediately to Mr. Johnson for appropriate action. Mr. Johnson represents to the court that he is the district manager of McBee Systems, a division of Kimball Systems, which is a division of Litton Business Systems, Inc., which is a wholly owned subsidiary of Litton Industries, Inc. This additional service should be made shortly since the papers were forwarded to the Marshal April 7, 1976.

6. The W-2 form of Mr. Miller showing that he receives salary on the payroll account of McBee Systems, Litton Business Systems, Inc. is not dispositive of the question of whether he was employed by Litton Industries, Inc. and whether Litton

Industries, Inc. does business in the State of New York. As far as the W-2 form of Mr. Miller is concerned, the most significant information there is the employer identification number which seems to have reference to the Litton Industries, Inc. account.

7. As defendants concede in the affidavit of Dan Johnson submitted to the court, as plaintiff has outlined in her previous papers to the court and as is outlined in the affidavit of James Livingston submitted herewith and made a part hereof as Exhibit A, Litton Industries, Inc. has done and is doing business through multiple divisions and/or subsidiaries. There are major operations in New York State of Litton Industries, Inc., among which are McBee Systems and Litton Business Systems, Inc. Litton Industries, Inc. has been organized and re-organized constantly; divisions are transferred, names changed and the corporate deck of cards shuffled to a degree that it is constantly confusing to even its own employees.

8. The employer, however, in any event is Litton Industries, Inc. The corporate entity that is doing business in the State of New York is Litton Industries, Inc. The court can see that Litton Industries, Inc. is the employer from the papers that the defendants submit supposedly in support of their position to suggest that other corporations rather than Litton Industries, Inc. have been the employer of Geraldine Sevor, plaintiff. The court should detach defendants' papers

most recently submitted and read the top of Exhibits A-10, A-13, A-14, A-15, A-16, A-17, A-18, A-19, A-20 and A-21. The court will see that on Exhibit A-10 that the employment document for Geraldine Sevor reads "Royal Typewriter Company, Inc., a division of Litton Industries" The Litton Industries logo appears on the form. On Exhibits A-12 through A-17, the documents are captioned Automated Business Systems, division of Litton Business Systems, Inc.; the Litton Industries, Inc. logo appears on all of these papers. In Exhibit A-17 the caption reads Automated Business Systems, division of Litton Industries; the Litton Industries, Inc. logo appears as well. On Exhibits A-18 and A-19 the forms read Litton ABS, Automated Business Systems; the Litton Industries, Inc. logo appears with the caption Litton. All of the paychecks which the defendants annexed to their papers as Exhibits A-20 and A-21 have the Litton Industries, Inc. logo and the Litton name on them in addition to reference to various divisions such as Litton ABS or Litton Business Systems, Inc.

9. In plaintiff's previous papers, she submitted a copy of the Litton Industries, Inc. annual report. Litton Industries, Inc. therein represents that it is present in New York doing business in New York through its various divisions and/or wholly owned subsidiaries, including, for example, McBee Systems and Litton Business Systems, Inc.

PLAINTIFF'S SUPPLEMENTAL AFFIRMATION OF EMMELYN LOGAN-BALDWIN, ESQ., dated 4-9-76, in Support of Cross-Motion to Compel Discovery and in Opposition to Motion to Dismiss.

10. Following the repeated representation by persons associated with Litton Industries, Inc. that they do no business in the State of New York and have no operations in the State of New York, my office caused a request to be made to Litton Business Systems, Inc. for a copy of its annual report. Litton Business Systems, Inc. responded by sending under postmark of April 2, 1976 a copy of Litton Industries, Inc. annual report for fiscal year ended July 31, 1975-the same annual report that plaintiff has previously submitted to this court as an exhibit to illustrate the operations of Litton Industries, Inc. in New York State. I attach hereto and make a part hereof as part of Exhibit B, a copy of the postmark and mailing slip that Litton Business Systems, Inc. used in forwarding this annual report. You will note that the return address shows the Litton Industries, Inc.) and reads Litton Industries, 201 East 42nd Street, New New York 10017. It is simply not correct for defendants to assert that Litton Industries, Inc. is not present in the State of New York and is not doing business in the State of New York and is not subject to process in the State of New York.

11. As additional evidence of the oeprations of Litton Industries, Inc. and in particular as evidence of Litton Industries, Inc.'s New York State operations, I attach herewith as Exhibit C a copy of the Litton Industries World Wide Directory

of Operations and Products-Winter 1974/75. Also I attach hereto and make a part hereof as Exhibit D a copy of the employment application form of McBee Systems which was submitted to the New York State Division of Human Rights. You will note that the Litton Industries, Inc. logo appears on this application form.

12. Defendants further admit in Exhibits D and E of the papers most recently submitted to the court that Litton Industries, Inc. has always been a party to the proceedings pursuant to Title VII. Exhibit D, the Notice of Charges sent by the Equal Employment Opportunity Commission went to Litton Industries, Inc. and to McBee Industries. The Notice of Right to Sue, Exhibit E, went to Litton Industries, Inc. and to McBee Industries. Defendants have always had notice of the pendency of all claims herein against all defendants herein.

13. It should be noted that Mr. Johnson's assertion that discrimination was not involved in his decision to terminate plaintiff Sevor is one of the ultimate issues of fact herein which is in dispute. Plaintiff in her complaint to the court and in her affidavit of March 18, 1976 submitted to the court contends that this decision, among other employment actions of the defendants, have been and are discriminatory on the basis of sex. Because these and other material issues of fact are in dispute there can be no basis for the granting of summary judgment which attorney for defendants suggests might be

appropriate in his most recently filed affidavit.

14. Nor is the characterization of plaintiff's claims in the Equal Employment Opportunity Commission notice, Exhibit D attached to defendants'most recent papers, controlling of the scope of plaintiff's claims in this lawsuit. Plaintiff has always claimed and still claims as she sets forth in her affidavit of March 18, 1976 that the defendants practice continuing, company-wide employment discrimination on the basis of sex. Those claims include the denial to her of equal terms, conditions and privileges of employment; the claims relate to recruitment, classification, training, transfer, promotion, and pay for example.

15. For these reasons, I respectfully request that plaintiff's cross-motion to compel discovery be granted and that defendants' motion to dismiss be denied.

Emmelyn Logan-Baldwin

April 9, 1976
Rochester, New York

Exhibit A – Affidavit of James A. Livingston, dated 4-9-76 attached to Logan-Baldwin Affirmation.

UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF NEW YORK

GERALDINE SEVOR, Plaintiff, -vs- LITTON INDUSTRIES and MCBEE SYSTEMS, a Subsidiary of Litton Industries, Defendants.	AFFIDAVIT IN SUPPORT OF CROSS-MOTION TO COMPEL DISCOVERY; OPPOSITION TO DEFENDANTS' MOTION TO DISMISS

STATE OF NEW YORK
COUNTY OF s/ Rensselaer
CITY OF Troy SS:

JAMES A LIVINGSTON, being duly sworn, according to law, deposes and says:

1. I reside at 221 Foxwood Drive, Clifton Park, New York 12065. I was the general supervisor for Geraldine Sevor when I worked as Area Systems Manager for Litton Automated Business Systems.

2. I was employed by Litton Automated Business Systems from around February 1967 until May 1975. During this period the company experienced various changes in corporate structure and organization as well as changes in name.

3. Litton Automated Business Systems, a division of the Business Equipment Group of Litton Industries, Inc. sold small business computers and McBee Business Products which included office forms, key sort cards as well as other office

Exhibit A — Affidavit of James A. Livingston, dated 4-9-76 attached to Logan-Baldwin Affirmation.

services.

4. Prior to 1969, McBee Company was a division of Litton Industries, Inc. which had purchased Royal-McBee Company sometime in 1965, and then split Royal-McBee into two divisions-Royal Typewriter Company Division and McBee Company Division.

5. In 1969, in the re-structuring process McBee became a division of Litton Automated Business Systems. Later sometime in 1974, Litton Industries, Inc. again re-structured the company and divided Litton Automated Business Systems. The name Litton Automated Business Systems was discontinued. The branch which sold small business computers was thus merged into Sweda International, a division of Litton Industries, Inc. and the McBee Products section became part of the Kimball Division of Litton Industries, Inc. To the best of my knowledge, there may be 100 or more similar divisions of Litton Industries, Inc.

6. While I was working with Litton Automated Business Systems, it was always understood that although Litton Automated Business Systems had its own president, vice-president, marketing manager and manufacturing manager, we were allowed to operate the company as a separate corporation, but ultimately they were accountable to Litton Industries, Inc.

7. Corporate officials from Beverly Hills, California, visited the offices here in New York State of Litton Automated

Business Systems several times during the year in order to examine the operations. Corporate officials exerted their control over the Litton Automated Business Systems operations in other ways as well. For example, at least once each year, the president of Litton Automated Business Systems had to develop one year, three year and five year plans which had to be presented and defended in person at corporate headquarters of Litton Industries, Inc., in Beverly Hills, California. In addition, Litton Automated Business Systems had to submit quarterly reports of sales and other financial data to Litton Industries, Inc. I believe that corporate officials from Litton Industries, Inc., requested additional information to these quarterly reports during periods of low profitability of Litton Automated Business Systems.

8. Within the corporate structure of Litton Industries, Inc., the various divisions were tied together as groups. For example, Litton Automated Business Systems was a division in one of these groups-the Business Equipment Group. Each of these groups had a group vice-president. Up until mid-1974, this position was held by Ralph O'Brien. The group vice-president was usually also a corporate vice-president of Litton Industries, Inc. The group vice-president was responsible

Exhibit A — Affidavit of James A. Livingston, dated 4-9-76 attached to Logan-Baldwin Affirmation.

for the profitability and operation of each division within the group. The group vice-president was directly accountable to the corporate headquarters in Beverly Hills, California.

s/ James A. Livingston
JAMES A. LIVINGSTON

Sworn to before me
this s/4th day of April, 1976.

s/ Louis J. Dunham
Notary Public
s/ Louis J. Dunham
Notary Public, State of New York
Qualified in Rensselaer County
Commission Expires March 30, 1977

Exhibit B – Copy of Postmark and Mailing Slip that Litton Business Systems, Inc. used in Forwarding the Annual Report attached to Logan-Baldwin Affirmation.

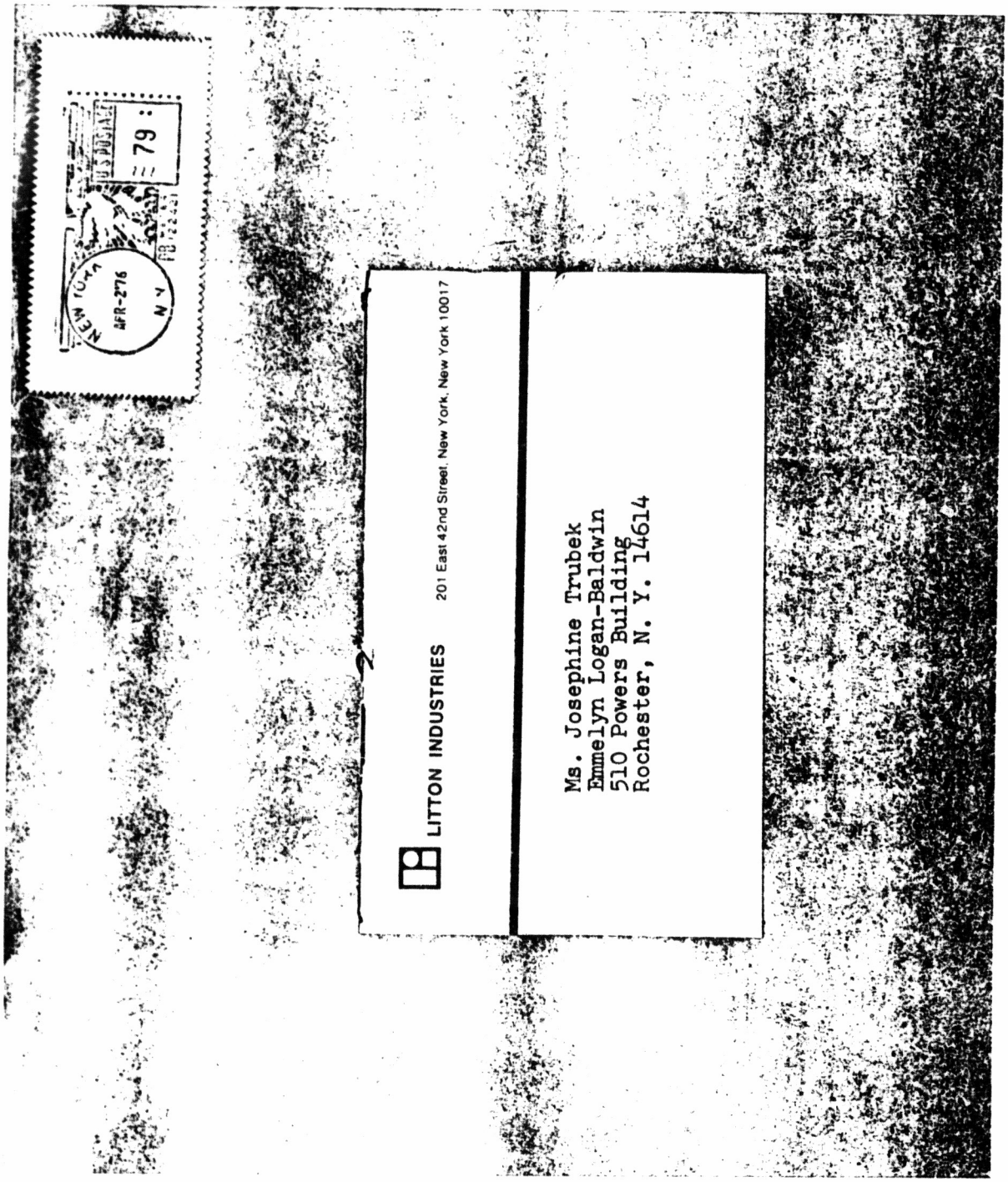


Exhibit C – Copy of Litton Industries World Wide Directory of Operations and Products – Winter 1974/75 attached to Logan-Baldwin Affirmation.

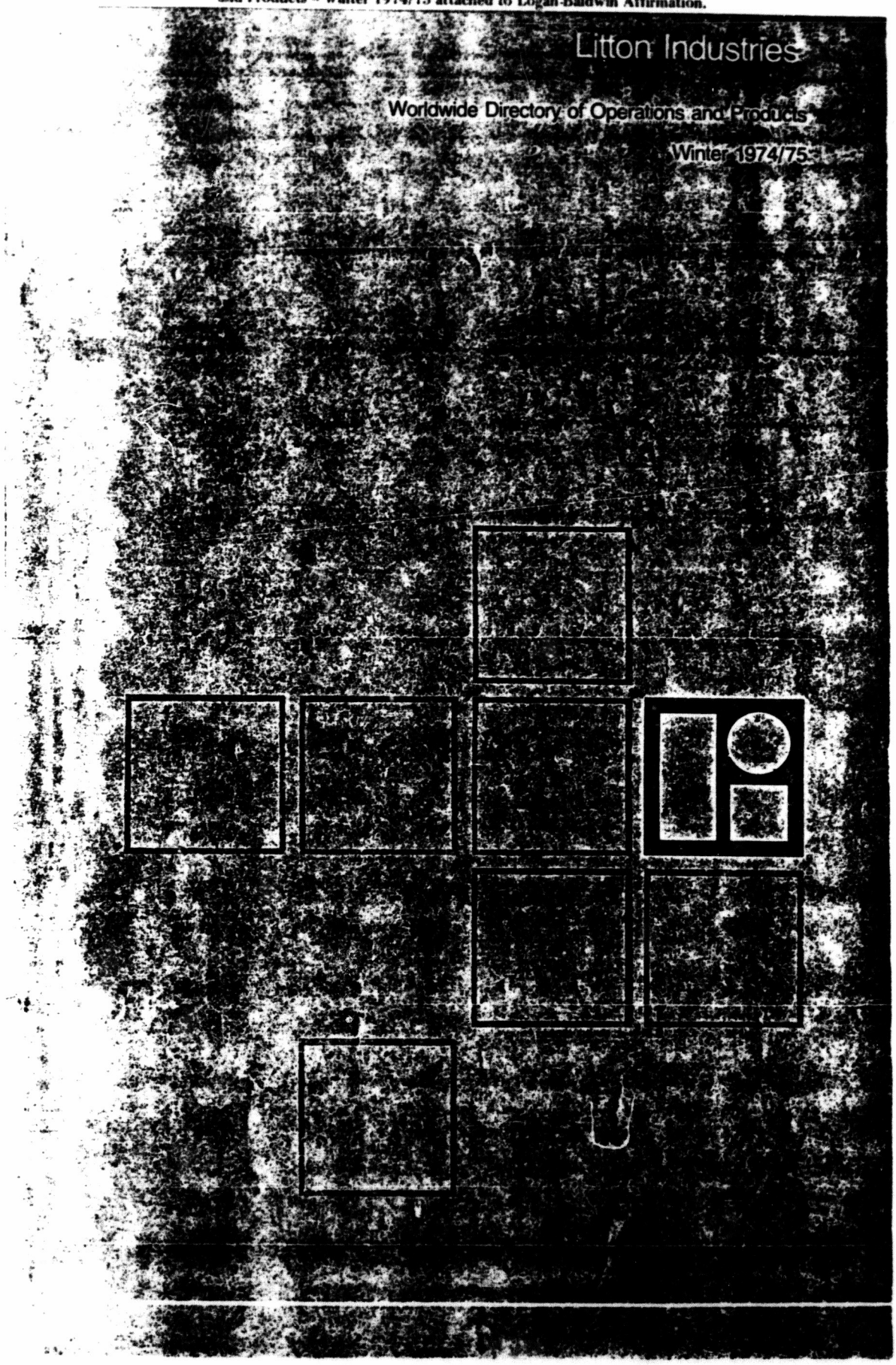


Exhibit C – Copy of Litton Industries World Wide Directory of Operations and Products – Winter 1974/75 attached to Logan-Baldwin Affirmation.

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Products Directory

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Accelerators, linear
medical ..... Litton Medical Systems
Accelerometers,
inertial ..... Guidance & Control Systems
LITEF
Accounting forms, systems and
equipment ..... Kimball Systems
McBee-Canada
McBee-Mexico
Sweda International
Accounting machines ..... Monroe
Triumph-Adler
Accounting and posting systems,
manual ..... Kimball Systems
Accounting systems,
electronic ..... Sweda International
Accounting systems (McBee) ..... Kimball Systems
Accounts payable systems
for banks ..... Litton Financial Printing
Actuators ..... Contromatics
Adding machines ..... Adler Business Machines
Imperial Typewriter
Litton Italia
Monroe
Monroe (Canada)
Monroe (Far East)
Monroe Venezolana
Royal
Royal-Imperial International
Triumph-Adler
Adhesive papers ..... Fitchburg Coated Products
Advertising specialties, printed ..... Carlisle
Olympic
Air defense systems ..... Data Systems
Airborne range instrumentation
systems ..... Guidance & Control Systems
Airborne warning and
control systems ..... Data Systems
Analog/digital conversion
equipment ..... Data Systems
Analog/digital electronic
devices ..... Guidance & Control Systems
Analog/digital I/O devices, display and
test equipment ..... Guidance & Control Systems
Analyzers, digital
differential ..... Guidance & Control Systems
Architectural design services ..... Streeter Design
Arm/disarm devices and
components ..... Poly-Scientific
Automated warehousing systems ..... Litton UHS
Automatic pilots ..... C. Plath
Automatic radio navigation receivers ..... Amecom
Automatic wiretapping ..... Inter/Pak
Back panel frames ..... USECO
Back panel wirewrap and design ..... Winchester
Bagasse, offset and other papers ..... Valentine
Ball valves ..... Contromatics
Ballasts, fluorescent and
mercury vapor ..... Jefferson Electric
Ballasts, inverter ..... Triad-Utrad
Bank checks ..... Litton Financial Printing
Bank forms ..... Litton Financial Printing
Bank passbooks ..... Litton Financial Printing
Bar machines, single and
multiple spindle ..... Amtec France
New Britain Machine
Battery chargers ..... Triad-Utrad
Bearings, self-lubricating,
construction ..... Merriman
Belts, conveyor systems ..... Litton UHS
Robins Engineers & Constructors
Binders,
business ..... McBee Loose Leaf Binder Products
Binders, computer
printouts ..... McBee Loose Leaf Binder Products
Biomedical services and
research ..... Litton Bionetics
Blending, storage &
retrieving systems for bulk
handling ..... Robins Engineers & Constructors
Blood-testing equipment ..... Hellige
Litton Medical Electronics
Books, educational ..... American Book
Litton Educational Publishing
McCormick-Mathers
D. Van Nostrand
Van Nostrand Reinhold
Van Nostrand Reinhold Australia
Van Nostrand Reinhold Canada
Van Nostrand Reinhold Ltd.
Books, reference ..... Van Nostrand Reinhold
Van Nostrand Reinhold Australia
Van Nostrand Reinhold Canada
Van Nostrand Reinhold Ltd.
Books, vocational, trade and crafts ..... Delmar
Litton Educational Publishing
Van Nostrand Reinhold
Van Nostrand Reinhold Australia
Van Nostrand Reinhold Canada
Van Nostrand Reinhold Ltd.
Vocational, Technical and Trade Publishing

Boring machines, horizontal and
vertical ..... Lucas
Boring and turning machines,
vertical precision contour ..... Amtec France
New Britain Machine
Brush Blocks ..... Poly-Scientific
Bulk material handling
systems ..... Robins Engineers & Constructors
Business equipment, sales/service
centers ..... Litton Business Equipment Holdings
Litton Business Systems International
Litton Business Systems (Austria)
Litton Business Systems (Belgium)
Litton Business Systems (France)
Litton Business Systems (Germany)
Litton Business Systems (Great Britain)
Litton Business Systems (Holland)
Litton Business Systems—Kimball/Monroe/
Royal-Imperial (Italy)
Litton Business Systems (Portugal)
Litton Business Systems (Spain)
Litton Business Systems (Sweden)
Litton Business Systems (Switzerland)
Maverick-Clarke
Plimpton's
Triumph-Adler Business Systems (Italy)
Business forms, sales, vouchers,
books, registry and sets,
continuous forms ..... Sturgis Newport
Business machine supplies ..... Roytype
Business machines ..... Adler Business Machines
Imperial Typewriter
Litton Italia
Maverick-Clarke
McBee-Canada
McBee-Mexico
Mogendorff
Monroe
Monroe (Canada)
Monroe (Far East)
Monroe Venezolana
Plimpton's
Royal
Royal (Canada)
Royal-Imperial International
Sweda International
Triumph-Adler
Westrex Asia
Westrex Orient
Business systems,
electronic ..... Sweda International
Calculators, electronic ..... Monroe
Monroe (Canada)
Monroe (Far East)
Monroe Venezolana
Royal
Royal (Canada)
Royal-Imperial International
Triumph-Adler
Calculators, hand-held ..... Monroe
Monroe (Canada)
Monroe (Far East)
Monroe Venezolana
Royal
Royal (Canada)
Royal-Imperial International
Calculators, programmable ..... Monroe
Monroe (Canada)
Monroe (Far East)
Monroe Venezolana
Capsule assemblies ..... Poly-Scientific
Carbide tools ..... Union/Butterfield
Carbon papers for business machines ..... Roytype
Card cages (electromechanical
hardware) ..... USECO
Cash registers, electronic and
electromechanical ..... Sweda International
Catheters, disposable ..... Sterimed
Catnode ray tubes ..... Electron Tube
Chain, engineering ..... Union Chain
Check printing ..... Litton Financial Printing
Chucking machines, multiple spindle,
automatic bar ..... Amtec France
New Britain Machine
Chucking machines, numerically
controlled ..... New Britain Machine
Circuit boards, printed,
multilayer ..... Advanced Circuitry
Circuit board artwork design and
loading ..... Advanced Circuitry
Clinical laboratory testing
services ..... Litton Bionetics
Clocks, electric ..... Jefferson Electric
Closed die forgings ..... Hand Tools
Coated papers ..... Decotone
Fitchburg Coated Products
Cobalt therapy units ..... Litton Medical Systems
Command and control systems ..... Data Systems
Communication control systems ..... Data Systems
Communication programs, technical ..... Mellonics
Communication systems, radio ..... Amecom
Communication systems, tactical ..... Data Systems
Communications systems,
telephone ..... Litton BTS
Compasses, gyro and magnetic ..... C. Plath
Compendia, professional ..... Litton Publications
Components,
hydraulic ..... Litton Fastening Systems
Computing crane warning
systems ..... Potentiometer
Computer memories ..... Litton Memory Products
Computer processing and related
services ..... Litton Reston Computer Center
Computer programming services ..... Mellonics
Computer software development ..... Mellonics
Computer time sharing, remote job entry,
programming and data base system
design ..... Litton Reston Computer Center
Computerized EKG analysis systems ..... Hellige
Litton Medical Electronics
Computers, memory stacks and
systems ..... Litton Memory Products
Computers, office, small ..... Monroe
Sweda International
Triumph-Adler
Computers, special purpose, analog
and digital ..... Data Systems
Guidance & Control Systems
LITAL
LITEF
Connector accessories and tools ..... Winchester
Connectors ..... USECO
Connectors, electronic and
electrical ..... Winchester
Connectors, electronic, cylindrical ..... Veam
Consulting services
systems ..... Robins Engineers & Constructors

Control systems, electronic,
military ..... Litton Systems (Canada)
Controls, computer ..... New Britain Plastics
Converter-battery chargers ..... Triad-Utrad
Converters, S/D and
D/R ..... Clifton-Special Devices
Conveyor accessories ..... Hewitt-Robins Passaic
Conveyor systems,
bulk ..... Robins Engineers & Constructors
Conveyor systems, design and construction ..... Robins Engineers & Constructors
Conveyor systems,
overhead ..... Conveyor Operations (Litton UHS)
Conveyor systems, unit ..... Litton UHS
Coolant systems, high pressure ..... Eldorado
Copiers, electrostatic
(Royfax) ..... Imperial Typewriter
Royal
Royal (Canada)
Royal-Imperial International
Copiers, plain paper ..... Royal
Copper wire, bunched and stranded,
bare and tinned ..... Liberty Wire
Counterbores ..... Union/Butterfield
Crane safety equipment ..... Potentiometer
Credit cards ..... Kimball/M&M
Kimball Systems
Crushing and screening plants, portable
and stationary ..... Hewitt-Robins Columbia
Crystals, optical and magnetic ..... Airtron
Custom screw machine products ..... USECO
Cutters ..... Butterfield-Canada
Union/Butterfield
Cutting tools, metal ..... Butterfield-Canada
Union/Butterfield
Data links, tactical ..... Data Systems
Data processing,
seismic survey ..... Western Geophysical
Data processing and display systems,
tactical military ..... Data Systems
Data processing
services ..... Litton Reston Computer Center
Data signal conversion
equipment ..... Clifton-Special Devices
Data systems, design ..... Mellonics
Data systems, retail ..... Sweda International
Decor design, retail stores ..... Streeter Design
Decorative papers and films ..... Decotone
Decotone-Permaco
Defibrillators ..... Hellige
Litton Medical Electronics
Deflection yokes ..... Triad-Utrad
Dental equipment and
supplies ..... Litton Dental Products
Dental X-ray chairs ..... Twin City Tool
Desks ..... ATAL
Cole
Cole-Canada
Lehigh-Leopold
Standard Desk
Diagnostic equipment, medical,
electronic ..... Hellige
Litton Medical Electronics
Disc grinders ..... Gardner Machine
Die-cast molds ..... Xcel Mold & Machine
Die-cast parts molds ..... Osley & Whitney
Die forgings ..... Hand Tools
Butterfield Canada
Dies ..... Union/Butterfield
Digital computers, military ..... Data Systems
Guidance & Control Systems
LITEF
Digital display and
readout systems ..... Clifton-Special Devices
Digital memory devices ..... Poly-Scientific
Digital printers, nonimpact,
ultra high-speed ..... Datalog
Diode displays, light emitting ..... Data Systems
Directories, professional ..... Litton Publications
Disc grinders ..... Gardner Machine
Landis-Gendron
Landis Lund
Display devices ..... Clifton-Special Devices
Data Systems
Electron Tube
Streeter
Display fixtures and decor, retail ..... Streeter
Display systems, military ..... Data Systems
Doppler-inertial-loran
systems ..... Guidance & Control Systems
Drilling machines ..... Lucas
Union/Butterfield
Drills ..... Butterfield-Canada
Union/Butterfield
Drills, high-speed, carbide ..... Butterfield-Canada
Union/Butterfield
Drives, standard and engineered ..... Louis Allis
Drives, rotating and
solid state adjustable ..... Louis Allis
EKG analysis systems, computerized ..... Hellige
Litton Medical Electronics
Educational materials and
services ..... American Book
Litton Educational Publishing
McCormick-Mathers
D. Van Nostrand
Election systems and supplies
printed ..... Carlisle
Electric clocks ..... Jefferson Electric
Electric isolation panels ..... Jefferson Electric
Electric motors, AC and DC ..... Louis Allis
Electric motors, sales and
service ..... Larsen-Hogue
Electrocardiographs ..... Hellige
Litton Medical Electronics
Electroencephalographs ..... Hellige
Litton Medical Electronics
Electromechanical assemblies ..... USECO
Electromechanical devices, precision,
military ..... Litton Systems (Canada)
Electronic business accounting
systems ..... Sweda International Litton Italia

Electronic calculators, desktop ..... Monro
Electronic connectors ..... Winchest
Electronic data systems,
retail ..... Sweda Internation
Electronic digital recording/
processing systems ..... Digital Data Systems
Electronic hardware ..... USEC
Electronic medical equipment ..... Hellig
Litton Medical Electronic
Electronic modules,
encapsulated ..... Poly-Scientif
Electronic warfare computer program
development ..... Mellonic
Electronic warfare systems ..... Amec
Guidance & Control Syste
EM-logs ..... C. Pla
Encoders, shaft angle ..... Encod
End mills ..... Butterfield-Cana
Union/Butterfie
Engineered
systems ..... Robins Engineers & Constructo
Engineering development products
support ..... Litton Systems (Canad
Engraving, stationery ..... Atlas Stationa
Boston L.O.P.
Everett Waddi
Maverick-Clari
Olympic Office Supp
Plimpton
Engraving cylinders for
rotogravure printing ..... Decotor
Fabric design and dyeing,
heat transfer process ..... Decotone-Permac
Facsimile equipment and systems ..... Datalo
Fasteners, industrial ..... Litton Fastening Syste
Fasteners, self-locking
(Orlo) ..... Litton Fastening Syste
Feeders, material handling
systems ..... Hewitt-Robins Columb
Ferrite devices ..... Airtr
Ferro-resonant transformers ..... Triad-Utra
Filing cabinets ..... ATA
Co
Cole-Canad
Food vending accessories ..... Litton Microwave Cooking Produc
Forgings, closed die ..... Hand Too
Forms, business ..... Sturgis Newpo
Friction welding
machines ..... New Britain Machin
Furnishings, office ..... ATA
Co
Cole-Canad
Lehigh-Leopol
Standard Des
Furniture systems, modular ..... Standard Des
Gears, helical ..... Merrim
Generators, sales and service ..... Larsen-Hogu
Geophysical electronic digital
recording equipment ..... Digital Data System
Geophysical mapping ..... Aero Servic
Geophysical surveys, air
and ground ..... Aero Servic
Geophysical surveys, marine
and land ..... Western Geophysic
Greeting card papers ..... Fitchbur
Grinders, disc ..... Gardner Machin
Landis-Gendro
Landis Lun
Grinders, precision cylindrical ..... Landis-Gendro
Landis Lun
Landis To
Grinders, surface ..... Gardner Machin
Ground support equipment ..... Data System
Ground support equipment,
aerospace ..... Litton Systems (Canad
Gundrills, gunreamers and
gun drilling machines ..... Eldorad
Gyro compasses ..... LITE
C. Pla
Gyroscopes,
inertial ..... Guidance & Control System
LITE
Hand tools ..... Hand Too
Handles (electronic hardware) ..... USEC
Handling systems,
bulk ..... Robins Engineers & Constructo
Handling systems, bulk,
design ..... Robins Engineers & Constructo
Handling systems, unit ..... Litton UH
Hardware, electronic ..... USEC
Headers ..... USEC
Health care systems and
studies ..... Litton Bionetic
Heat transfer, fabric dyeing ..... Decotone-Permac
Heat transfer materials, printing ..... Carlisl
Hobs ..... Butterfield-Canad
Union/Butterfie
Horizon reference systems, naval ..... LITE
Hydraulic
components ..... Litton Fastening System
Hypodermic syringes and
needles ..... Henke—Sass Wolf Gmbl
Identification stock control systems,
retail ..... Kimball System
Idlers, handling
systems ..... Hewitt-Robins Passai
Image intensifiers ..... Electron Tub
Impression film for
business machines ..... Roytyp
Indexes ..... McBee Loose Leaf Binder Product
Indexable inserts, carbide ..... Butterfield-Canad
Indicators, rate-of-turn ..... C. Plat
Industrial measuring and recording
equipment ..... Hellig
Litton Medical Electronic
Inertial measurement
units ..... Guidance & Control System
Inertial navigation
systems ..... Guidance & Control System
LITA
LITE
Litton Systems (Canad
Inertial navigation systems,
commercial ..... Aero Produ
Inertial platforms ..... Guidance & Control System

Exhibit C – Copy of Litton Industries World Wide Directory of Operations and Products – Winter 1974/75 attached to Logan-Baldwin Affirmation.

Information retrieval systems ... McBee-Canada
McBee Mexico
Sweda International
Interface electronics ... LITEF
Information systems
retail ... Sweda International
Instruments
surgical ... Henke-Sass Wolf GmbH
Intensive care systems
medical ... Hellige
Litton Medical Electronics
Interconnect systems ... Litton BTS
Interior decor design, retail ... Streater
Interior design and planning, retail ... Streater Design
Inverter ballasts ... Triad-Utrad
Isolation panels, electrical ... Jefferson Electric
Jewelry products ... Airtron
Journals, medical ... Medical Publications
Keysort systems ... McBee (Kimball)
Klystrons ... Electron Tube
Knobs (electronic hardware) ... USECO
Knurls ... Reed Rolled Thread Die
Label dispensers ... Kimball Systems
Mogendorff
Label marking machines ... Kimball Systems
Mogendorff
Labels, pressure sensitive ... Kimball Systems
Mogendorff
Labels pressure sensitive for
EDP equipment ... Roytype
Labels, product ... Carlisle
Laboratory services, clinical ... Litton Bionetics
Laser rods for
research and industry ... Lambda Optics
Light emitting diode displays ... Data Systems
Lighting ballasts ... Jefferson Electric
Lithography, web and sheet-fed ... Carlisle
Lung function testing equipment ... Mijnhardt
Machine tools ... Amtec France
Butterfield-Canada
Contromatics
Eldorado
Gardner Machine
Hand Tools
Koehler-Dayton
Landis-Gendron
Landis Lund
Landis Tool
Lucas
Merriman
New Britain-Amtec U.K.
New Britain Machine
New British Plastics Machine
Osley & Whitney
Reed Rolled Thread Die
Union/Butterfield
Xcel Mold & Machine
Machine tools components
and attachments ... New Britain Machine
Machinery systems, special ... Lucas
Magnetic compasses ... C. Plath
Magnetrons ... Electron Tube
Main steering systems,
electronic ... C. Plath
Manual accounting systems and
forms (McBee) ... Kimball
Manuals, pre-
cedure ... McBee Loose Leaf Binder Products
Marine navigation systems ... LITEF
Marine seismic surveys ... Western Geophysical
Material handling systems,
bulk ... Robins Engineers & Constructors
Material handling systems,
unit conveyor ... Litton UHS
Medical diagnostic recorders,
multichannel ... Hellige
Litton Medical Electronics
Medical electronic diagnostic
equipment ... Hellige
Litton Medical Electronics
Medical equipment,
radiological ... Litton Medical Systems
Medical instruments, ergometry ... Mijnhardt
Medical instruments,
lung function testing ... Mijnhardt
Medical journals ... Litton publications
Medical tubes, disposable ... Sterimed
Memory core planes ... Litton Memory Products
Memory devices, digital ... Poly-Scientific
Memory stacks and
systems ... Litton Memory Products
Metal drilling tools ... Butterfield-Canada
Union/Butterfield
Metal cutting machines ... Amtec France
Eldorado
Lucas
New Britain Machine
Metal grinding machines ... Gardner Machine
Landis-Gendron
Landis Lund
Landis Tool
Metal slitting saws ... Union/Butterfield
Micro-radiology
systems ... Litton Medical Systems
Microwave components ... Airtron
Microwave oscillators,
solid state ... Electron Tube
Microwave
ovens ... Litton Microwave Cooking Products
Microwave tubes ... Electron Tube
Military tactical data processing
systems ... Data Systems
Milling machines ... Lucas
Mini computers ... Monroe
Sweda International
Triumph-Adler
Missile inertial guidance
systems ... Guidance & Control Systems
Mobile diagnostic
units ... Litton Medical Systems
Modular furniture systems ... Lehigh-Leopold
Standard Desk
Molded products (hardware) ... USECO
Molds for plastic parts ... Osley & Whitney
Xcel Mold & Machine
Monitoring systems, medical ... Hellige
Litton Medical Electronics
Motors, 1-10,000 HP
AC and DC ... Louis Allis
Motors, DC ... Clifton Precision Products
Motors, sales and service ... Larsen-Hogue
Multichannel recorders, medical ... Hellige
Litton Medical Systems
Multi-spindle machines, automatic, bar
and chucking ... Amtec France
New Britain Machine
Nautical instruments ... C. Plath
Navigation equipment, marine ... C. Plath
Navigation systems, inertial
commercial ... Aero Products
Navigation systems, inertial
military ... Guidance & Control Systems
LITAL
LITEF
Litton Systems (Canada)
Navigation systems, OMEGA and
LORAN ... Amecom
Nuclear submarines, construction
and overhaul ... Ingalls Shipbuilding
Numerically controlled equipment,
industrial ... Lucas
New Britain Machine
Office furnishings, steel ... Atlas Stationers
Boston L.O.P.C.
Cole
Cole-Canada
Everett Waddey
Maverick-Clarke
Olympic Office Supply
Plimpton's
Standard Desk
Office furnishings, upholstered ... Cole-Canada
Lehigh-Leopold
Standard Desk
Office furnishings, wooden ... ATAL
Lehigh-Leopold
Standard Desk
Office machines, distribution ... Maverick-Clarke
McBee-Canada
Plimpton's
Office planning services ... Maverick-Clarke
Office supplies ... Atlas Stationers
Boston L.O.P.C.
Everett Waddey
Maverick-Clarke
Olympic Office Supply
Plimpton's
Roytype
Operations analysis ... Mellonics
Oscillators, solid-state
microwave ... Electron Tube
Ovens, micro-
wave ... Litton Microwave Cooking Products
PABX telephone switching systems ... Litton BTS
Pallet equipment, unit handling
systems ... von Gal Operations (Litton UHS)
Paper, bagasse ... Valentine
Papers, coated, for
reproduction ... Decotone-Permaco
Papers, electrofax and electrosensitive
for recording and
reproduction ... Fitchburg Coated Products
Papers and films, decorative for
furniture and paneling ... Decotone
Decosure-Permaco
Papers, offset printing ... Papeterie De Versoix
Papers, pressure sensitive
adhesive ... Fitchburg Coated Products
Papers, specialty ... Fitchburg
Papeterie De Versoix
Papers, stationery ... Papeterie De Versoix
Papers, surgical sterilized ... Fitchburg
Patient monitoring systems ... Hellige
Litton Medical Electronics
Payroll check systems ... Litton Financial Printing
Photocopying papers ... Fitchburg
Photographic supplies ... Plimpton's
Photogrammetric engineering ... Aero Service
Plain paper copiers ... Royal
Plastics injection molding
machines ... New Britain Plastics Machine
Plastics molds ... Xcel Mold & Machine
Plastic products, printed ... Kimball/M&M
Kimball Systems
Litton Financial Printing
Platforms, inertial ... Guidance & Control Systems
LITEF
Point-of-purchase items, printed ... Carlisle
Point-of-sale terminals,
electronic ... Litton Italia
Sweda International
Polyurethane "Tuffgard" fire
products ... Hewitt-Robins Passaic
PolyScription forms ... Litton Financial Printing
Potentiometers, precision ... Potentiometer
Powdered metal parts ... Merriman
Power supplies, high voltage ... Triad-Utrad
Pressure sensitive adhesive
products ... Fitchburg Coated Products
Price
books ... McBee Loose Leaf Binder Products
Printed circuit boards ... Advanced Circuitry
Printed circuit board assemblies ... Triad-Utrad
Printers, nonimpact, high-speed,
digital ... Datalog
Printing, checks ... Litton Financial Printing
Printing, forms and stationery ... Atlas Stationers
Boston L.O.P.C.
Everett Waddey
Maverick-Clarke
Olympic Office Supply
Plimpton's
Printing, general ... Carlisle
Printing, rotogravure ... Decotone
Decotone-Permaco
Printing, specialty ... Carlisle
Eureka Marketing Systems
Process controls,
machinery ... New Britain Plastics Machine
Profilers, vertical, numerically
controlled ... Lucas
Projection equipment, theater ... Westrex
Projector carbons ... Westrex
Proposal
covers ... McBee Loose Leaf Binder Products
Publications, professional ... Litton Publications
Public address systems ... Westrex
Pumps, circulating ... Emerly
Radio communications systems and
products ... Amecom
Radio navigation equipment ... C. Plath
Radio navigation systems (OMEGA and
LORAN) ... Amecom
Radiological equipment and
supplies ... Litton Medical Systems
Reamers ... Butterfield-Canada
Union/Butterfield
Receivers, radio, automatic ... Amecom
Recorders, medical, multichannel ... Hellige
Litton Medical Electronics
Recording and reproduction
papers ... Fitchburg Coated Products
Recording papers, coated ... Decotone-Permaco
Fitchburg Coated Products
Recording equipment, studio ... Westrex
Recording systems, military ... Data Systems
Reference books ... Litton Educational Publishing
Rheostats, precision ... Potentiometer
Reproduction papers,
electrosensitive ... Fitchburg Coated Products
Research, electron devices ... Electron Tube
Research, electronic point-of-sale
systems ... Sweda International
Research, electronic business
systems ... Sweda International
Research, life sciences ... Litton Bionetics
Resistors ... Poly-Scientific
Potentiometer
Resolvers ... Clifton Precision Products
Resource exploration and
evaluation ... Aero Service
Western Geophysical
Retail information systems,
electronic ... Sweda de Mexico
Sweda International
Sweda International, Canada
Retail stock control systems ... Kimball Systems
Ribbons, business machines ... Roytype
Ribbons, computers ... Roytype
Ring
binders ... McBee Loose Leaf Binder Products
Rolled thread dies ... Reed Rolled Thread Die
Rotary switches ... Poly-Scientific
Potentiometer
Rotogravure cylinders, engraved ... Decotone
Rotogravure printing ... Decotone
Decotone-Permaco
Royfax copiers ... Royal
Royal (Canada)
Royal-Imperial International
Sales
catalogs ... McBee Loose Leaf Binder Products
Sales registers, electromechanical ... RCS S.P.A.
Svenska Dataregister
Sweda de Mexico
Sweda International
Sweda International, Canada
Triumph-Adler
Westrex, Asia
Sales registers, electronic ... RCS S.P.A.
Sweda International
Sales registers,
electromechanical ... Sweda International
Svenska Dataregister
Saws, metal slitting ... Union/Butterfield
Screw machine products, custom ... USECO
Seismic surveys ... Western Geophysical
Semiographs ... Litton Medical Systems
Servo assemblies ... Clifton-Special Devices
Servo modules ... Potentiometer
Sextants ... C. Plath
Ship communications, electronic ... Amecom
Ship construction, Naval and
commercial ... Ingalls Shipbuilding
Ship control systems ... Data Systems
Guidance & Control Systems
Ship design, Naval and
commercial ... Ingalls Shipbuilding
Ship engineering ... Ingalls Shipbuilding
Ship systems analysis ... Ingalls Shipbuilding
Shipboard integrated electronic control
systems ... Data Systems
Guidance & Control Systems
Simulated diamonds ... Airtron
Simulation sciences ... Aero Service
Slip-ring assemblies ... Poly-Scientific
SLAR engineering ... Aero Service
Soldering materials ... Kester Solder
SOLVE modular office furniture
systems ... Standard Desk
Spacers ... USECO
Stationery, printing ... Atlas Stationers
Boston L.O.P.C.
Everett Waddey
Maverick-Clarke
Olympic Office Supply
Plimpton's
Stellar-inertial-doppler navigation
systems ... Guidance & Control Systems
Store display fixtures ... Streater
Store fixtures, financing and
installation ... Streater
Store planning services ... Streater
Streater Design
Studies, engineering,
feasibility ... Robins Engineers & Constructors
Submarines, construction and
overhaul ... Ingalls Shipbuilding
Surgical instruments ... Henke-Sass Wolf GmbH
Surveying, geophysical ... Aero Service
Western Geophysical
Switches, rotary ... Poly-Scientific
Potentiometer
Switching systems, telephone ... Litton BTS
Swivels, extensions and
fittings ... Litton Fastening Systems
Synchros ... Clifton Precision Products
Syringes, disposable and
reusable ... Henke-Sass Wolf GmbH
Systems engineering ... Mellonics
Systems, test and evaluation ... Mellonics
Tactical data systems ... Litton Systems (Canada)
Tag punch marking machines ... Kimball Systems
Tag reading equipment,
electronic ... Kimball Syste
Tags, labels and tickets ... Kimball/M
Kimball Syste
Mogend
Nation
Westrex A
Westrex Or
Tags, multipart manifold, shipping,
specialty die cut ... Kimball Syste
Taps and dies ... Butterfield-Can
Union/Butterfi
Telemetering equipment, medical ... Hell
Telephone interconnect systems ... Litton B
Telephone switching systems
(PABX) ... Litton B
Teletype equipment, computer
applications ... West
Terminal boards ... USE
Terminals, electronic ... USE
Terminals, retail,
point-of-sale ... Sweda Internatio
Svenska Dataregis
Terminals, insulated ... Winches
USE
Test equipment, automatic ... Data Syste
Textbooks, pre-school through
college ... American Bo
Litton Educational Publishi
McCormick-Mathe
D. Van Nostra
Textbooks, trade and
professional ... Litton Educational Publishi
Van Nostrand Reinh
Van Nostrand Reinhold Austra
Van Nostrand Reinhold Cana
Van Nostrand Reinhold Engla
Textbooks, vocational and technical ... Delm
Litton Educational Publishi
Vocational, Technical and Industrial Publishi
Textile rings ... Merrim
Thermography equipment,
medical ... Litton Medical Syste
Thread rolling dies ... Reed Rolled Thread D
Thread rolling machines and
attachments ... Reed Rolled Thread D
Thread rolls and
knurls ... Reed Rolled Thread Di
Tool holders ... Butterfield-Cana
Tools, drilling ... Butterfield-Cana
Reed Rolled Thread D
Union/Butterfie
Tools, grinding ... Gardner Machi
Landis-Gendro
Landis Lu
Landis To
Tools, metal cutting ... Amtec Fran
Eldora
Luc
New Britain Machi
Torquers ... Clifton Precision Produc
Transducers, pendulum ... Potentiomet
Transformers ... Jefferson Electr
Triad-Utr
Transformers, sales and service ... Larsen-Hogu
Transportation systems, bulk
handling ... Robins Engineers & Constructo
Traveling wave tubes ... Electron Tu
Tubes, electron ... Electron Tu
Tubes, medical, disposable ... Sterim
Tubes, microwave ... Electron Tu
Tubes, X-ray ... Eureka X-Ray Tu
Litton Medical Systen
Twist drills, high speed,
carbide ... Butterfield-Canad
Union/Butterfie
Typewriters, office and consumer, electric
and manual ... Adler Business Machine
Imperial Typewrit
Monroe Venezolan
Roy
Royal (Canad
Royal-Imperial Internation
Triumph-Adl
Typewriter ribbons, supplies and
accessories ... Roytyp
Ultrasonic diagnostic
services ... Litton Medical System
Unit handling systems and
equipment ... Litton UH
Valve actuators ... Contromatic
Valves, ball and butterfly ... Contromatic
Vertical profilers, numerically
controlled ... Luca
Vibrating screens, material handling
systems ... Hewitt-Robins Columbi
Wallpapers ... Fitchbur
Warfare systems, electronic ... Amecor
Data System
Warfare systems, electronic,
programming ... Mellonic
Washers, unit conveyor
systems ... Conveyor Operations (Litton UHS
Waste management systems ... Koehler-Dayto
Waveguides ... Airtro
Weapons delivery
systems ... Litton Systems (Canada
Wire, copper, magnetic and
processed ... Liberty Wir
Wirewrapping, automatic ... Inter/Pa
Word processing equipment ... Triumph-Adle
X-ray tube parts ... Twin City Toc
X-ray chairs and units, dental ... Twin City Toc
X-ray equipment and supplies,
medical ... Litton Medical System
X-ray machines,
mobile ... Litton Medical System
X-ray tubes, medical, dental,
industrial ... Eureka X-Ray Tub

Exhibit C – Copy of Litton Industries World Wide Directory of Operations and Products – Winter 1974/75 attached to Logan-Baldwin Affirmation.

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Division Locations

Adler Business Machines
1600 Route 22
Union, NJ 07083
(201) 964-3200
U.S. marketing organization for Adler business machines

Adlerwerke
vorm. Heinrich Kleyer AG
Kleyerstrasse 17
D-6 Frankfurt/Main, Germany
(611) 730347
Research, development and production of manual and electric office typewriters.

Advanced Circuitry
4811 West Kearney Street
Mail to: P.O. Box 2847
Springfield, MO 65803
(417) 862-0751
Printed and multilayer circuit boards, artwork design, board loading.

Aero Products
21050 Burbank Boulevard
Woodland Hills, CA 91364
(213) 887-2596
Navigation and guidance systems for commercial airlines and general aviation.

Marketing Representation:

9 Avenue Franklin Roosevelt
Paris 8e, France
(1) 225-43-57

Gefinor Center Suite 208D
Beirut, Lebanon

Aero Service
7800 Westpark Drive
Mail to: P.O. Box 1939
Houston, TX 77042
(713) 784-5800

Also

4219 Van Kirk Street
Philadelphia, PA 19135
(215) 533-3900

390 North Alpine Drive
Beverley Hills, CA 90210
(213) 275-4523

Photogrammetric and SLAR engineering, airborne and ground geophysical surveys, geophysical mapping, simulation sciences, resource exploration and evaluations.

Aero Service (Great Britain)
152 Coles Green Road
Cricklewood, London NW2
(1) 452 3996
Representative for aerial surveys and photography

Airtron
200 East Hanover Avenue
Morris Plains, NJ 07950
(201) 539-5500
Microwave components, including waveguides and ferrite devices; optical and magnetic crystals; jewelry products

Amacom
5115 Calvert Road
College Park, MD 20740
(301) 864-5900
Electronic warfare systems, radio communications systems and products, radio navigation systems (OMEGA and LORAN) and products, including receivers; ship communications electronics.

American Book
450 West 33rd Street
New York, NY 10001
(212) 594-8660
Textbooks, educational materials and services

American Book (Philippines)
1825 Sandejas
Pasay City, Philippines
Mail to: P.O. Box 836
Manila, Philippines
Textbooks, educational materials

Amtec France
11-13 rue Lavoisier
92 Nanterre, France
204-33-40
Multiple spindle automatic bar and chucking machines; vertical precision contour boring and turning machines

ATAL
7, rue Marlotte
75017 Paris, France
(1) 387 17-30
Metal and wood office furniture: desks, files, seating and cabinets

Atlas Stationers
364 South Anderson Street
Los Angeles, CA 90033
(213) 269-7461
Office supplies and furniture; printing and engraving

Boston L.O.P.C. (Litton Office Products Cente
84 Kingston Street
Boston, MA 02111
(617) 542-2028
Office supplies and furniture; printing and e graving.

Butterfield-Canada
Rock Island
Quebec, Canada
(819) 876-2721
Metal cutting tools including drills, taps, e dies, reamers, end mills, cutters and hobs high-speed steel, carbide tipped and so carbide; tool holders and carbide indexat inserts.

Carlisle
645 Harrison Street
San Francisco, CA 94107
(415) 421-2748
General printing, web and sheet-fed lithograp annual reports, bonds, brochures, catalo checks; election systems and supplies; he transfer material, labels, embossed labels, m nicipal printing, periodicals and point-of-pu chase items.

Clifton Precision
Broadway and Marple Avenues
Clifton Heights, PA 19018
(215) 622-1000
Synchros, resolvers, torquers, D.C. motors.

Clifton-Special Devices
5100 State Road
Drexel Hill, PA 19026
(215) 622-1000
Digital display and readout systems for aircra converters, S/D and D/R; servo assembli for aircraft and ships; data signal conversi equipment.

Cole
640 Whiteford Road
York, PA 17405
(717) 854-1545
Office furnishing products in contemporary, co ventional and executive designs

Cole-Canada
1885 Birchmount Road
Scarborough, Ontario, Canada
(416) 293-8221
Steel and upholstered office furniture.

Contromatics
200 West Main Street
Rockville, CT 06068
(203) 875-3317
Ball valves, pressure sealing butterfly valves a actuators.

Data Systems
8000 Woodley Avenue
Van Nuys, CA 91409
(213) 781-8211
Tactical communications systems, tactical da links, communication control systems, da processing and equipment, ground supp equipment, air defense systems, command a control systems, data processing and displ systems, military recording systems, analo digital conversion equipment, tactical air su port, airborne warning and control, integrat ship control, light emitting diode displa automatic test equipment.

Marketing Representation:

5061 Kleineichen
Nonnenweg-4
Germany
(02205) 3058

P.O. Box 1454
Tehran, Iran
895 375

5-8 Roppongi International Building
3-12, 7-Chome, Roppongi
Minato-ku, Tokyo, Japan
(03) 401-2046

102 Boulevard de Waterloo
1000 Brussels, Belgium
5389073

Datalog
1770 Walt Whitman Road
Melville, NY 11748
(516) 694-8300
Nonimpact, ultra-high-speed digital printe facsimile equipment and systems for graph communications.

Marketing Representation:

Nonnenweg 16 a
D-5061 Kleineichen, Germany
(2203) 63827

11 Rozanis Street
Tel Aviv 61390, Israel
77 51 51

P.O. Box 1
Chepstow, Mon. NP6, SUA, Great Britain
Penhow (0633-45) 564

Decatone
Route 2A
Mail to: P.O. Box 311
Westminster, MA 01473
(617) 874-5901
Rotogravure printing on paper, vinyl, acrylic a polystyrene films for use in furnishings a paneling, printing and embossing of vinyl fi for lamination; custom design services; ro gravure engraved cylinders.

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Decolone-Permaco
Henry Fordlaan 9
B-3600 Genk (Limburg) Belgium
(011) 35 59 11
Rotogravure printing of papers, vinyl and styrene films for the laminating, furniture and building industries; coated recording papers for medical, scientific and industrial applications; design and dyeing of fabrics through heat transfer process.

Delmar
50 Wolf Road
Albany, NY 12205
(518) 459-1150
Vocational and technical textbooks

Digital Data Systems
3930 Westholme
Houston, TX 77042
(713) 781-8871
Manufacture, sales and maintenance of electronic digital recording and processing equipment for the geophysical industry

Eldorado Tool
336 Boston Post Road
Milford, CT 06460
(203) 878-1711
Gundrills, gunreamers, gun drilling machines, high-pressure coolant systems and gundrill sharpening equipment

Electron Tube
960 Industrial Road
San Carlos, CA 94070
(415) 591-8411
Microwave tubes, including magnetrons, traveling wave tubes and klystrons; solid-state microwave oscillators; cathode ray tubes and tube related equipment; basic and applied research in electron devices, image intensifiers.

also
215 A Boon Keng Road
Kallang Industrial Estate
Singapore 12
2581133
Magnetrons for microwave ovens

Emerjy
37 rue Colin
69 Villeurbanne, Rhone, France
(78) 84-74-57
Circulating pumps for domestic heating systems.

Encoder
20745 Nordhoff Street
Chatsworth, CA 91311
(213) 341-6161
Encoders which provide shaft angle positions to interface with digital computer circuitry or computers in military, industrial and commercial systems.

Eureka Marketing Systems
Back Lane
Clayton West, Huddersfield
Yorkshire, Great Britain HD8 9PN
(048 486) 2981
Specialty printing and coated products

Eureka X-Ray Tube
3250 North Kilpatrick Avenue
Chicago, IL 60641
(312) 545-3126
X-ray tubes for medical, dental and industrial applications.

Everett Waddey
1101 East Laburnum Avenue
Richmond, VA 23222
(804) 329-3561
Warehouse and sales outlets for office supplies, office furniture; printer and engraver of letterheads and stationery

Fitchburg
[illegible] River Street
[illegible]burg, MA 01421
(617) 345-4361
Specialty papers, including base papers for saturating, diazo casting, surgical, sterilization, photocopying, wallpaper, greeting cards and general printing; flame retardant papers.

Fitchburg Coated Products
East Corey Street
Meadville, PA 16507
Mail to P.O. Box 1106
Scranton, PA 18501
(717) 347-2035
Pressure sensitive adhesive products, recording and reproduction papers and specialty coatings

Gardner Machine
1461 Gardner Street
South Beloit, IL 61080
(815) 389-2251
Disc grinders, surface grinders and abrasive disc wheels.

Guidance & Control Systems
8800 Canoga Avenue
Woodland Hills, CA 91364
(213) 887-4040
Inertial navigation systems, doppler-inertial-loran navigation systems, stellar-inertial-doppler navigation systems, inertial measurement units, missile inertial guidance systems, inertial platforms, gyroscopes and accelerometers, analog and digital electronic devices including input/output, display and test equipment; digital computers for aircraft navigation, communications, missile guidance, electronic warfare and control systems; digital differential analyzers; ship control systems including propulsion, steering and auxiliary control subsystems and ship's bridge control systems and equipment; airborne range instrumentation systems.

Hand Tools Division
South Street
Mail to P.O. Box 1320
New Britain, CT 06050
(203) 229-1641
Mechanics' hand tools for industry and the home market

Also
160 Cottage Street
Mail to P.O. Box 2050
Springfield, MA 01101
(413) 733-7847
Closed die forgings of carbon steel, titanium, aluminum, brass and exotic metals

Heiliga
Heinrich-von-Stephanstrasse 4
Postfach 728
D-78 Freiburg/Breisgau, Germany
(761) 40111
Medical electronic diagnostic equipment including electrocardiographs, electroencephalographs, defibrillators, multichannel recorders and other measuring and recording devices for pre-operative, surgical and post-operative patient monitoring systems, intensive care systems, blood testing equipment; computerized EKG analysis systems; measuring and recording equipment for industrial purposes

also
Bismarckstrasse 97/98
1000 Berlin 12, Germany
(030) 313 50 34/35
Marketing of Heiliga electronics equipment and Mijnhardt products.

Heiliga (Austria)
Geblergasse 94
A-Vienna XVII, Austria
46 36 33
Marketing of medical electronics, including Mijnhardt products.

Heiliga France
49, rue d'Oberhausbergen
F-67 Eckbolsheim, France
(88) 780 101
Marketing of medical electronics

Heiliga Italia
Viale di Porta Vercellina 20
I-20123 Milan, Italy
(2) 46 34 86
Marketing of medical electronics equipment in the areas of cardiology, pneumology and neurology

Heiliga Sweden (Helcomed Norden AB)
Klangfaergegatan 11
S-421 20 Vaestra Froelunda, Sweden
(031) 29 23 58
Marketing of medical electronics

Henke-Sass Wolf GmbH
Kronenstrasse 16
D-72 Tuttlingen, Germany
7 10 74(7461) 717-719/5035
Disposable and reusable hypodermic syringes and needles; surgical instruments for medical, dental and veterinary use

Hewitt-Robins (Canada)
750 Lebeau Boulevard
St. Laurent, Montreal
Quebec, Canada
(514) 332-1280
Bulk handling and processing equipment, unit handling equipment, engineered material handling systems.

Hewitt-Robins Columbia
US Highway 1 North
Columbia, SC 29206
(803) 788-1424
Crushers, portable and stationary crushing plants, feeders, shakeouts and vibrating screens

Hewitt-Robins Passaic
270 Passaic Avenue
Passaic, NJ 07055
(201) 777-5500
Conveyor idlers, mine conveyors, conveyor accessories, polyurethane "Tuffgard" products.

Imperial Typewriter
Imperial House
133/149 St. Nicholas Circle
Leicester LE1 4LE, Great Britain
(533) 50481 and 50551
Marketing of electric and manual office and portable typewriters, adding machines and electrostatic copiers.

Also
East Park Road
Leicester LE5 4QF, Great Britain
(533) 769189

Hedon Road
Hull HU9 5NH, Great Britain
(482) 76225
Manufacture of Royal-Imperial typewriters for world markets

Ingalls Shipbuilding
P.O. Box 149
Pascagoula, MS 39567
(601) 769-6110
New construction of Naval and commercial ships, new construction and overhaul of conventional and nuclear-powered submarines, advanced Naval and commercial ship design, engineering and systems analysis

Intep/Pak
13538 Saticoy Street
Van Nuys, CA 91409
(213) 786-9381
Automatic wire wrapping for the computer industry

Jefferson Electric
840 25th Avenue
Bellwood, IL 60104
(312) 626-7700
Ballasts, fluorescent and mercury vapor transformers and electric clocks; electric isolation panels

Kester Solder
4201 Wrightwood Avenue
Chicago, IL 60639
(312) 235-1601
Soldering materials

also
1 Prince Road
Brantford, Ontario, Canada
(519) 753-3425

215 A Boon Keng Road
Kallang Industrial Estate
Singapore 12
53 22 33

Kimball Systems
151 Cortlandt Street
Belleville, NJ 07109
(201) 759-6500
Retail stock control and identification systems, including integrated data processing equipment and supplies; pressure sensitive labels; electronic tag reading equipment; label marking and tag punch marking machines and dispensers; tickets, tags (multipart manifold, shipping, specialty, die-cut), and other stock control products; plastic products and credit cards; Litton ABS McBee manual accounting and posting systems.

Kimball Systems Canada
85 Advance Road
Toronto, Ontario, Canada
(416) 233-1135
Punched and regular tags, pressure sensitive labels, flexible packag[illegible]

Kimball/M&M
3717 Park Place
Montrose, CA 91020
(213) 248-8580
Tags, tickets and labels, plastic credit cards.

Kimball/U.K.
Totman Crescent
Weir Industrial Estates
Rayleigh, Essex, SS6 7xB, Great Britain
(3742) 3841
Tags and labels, punched and general.

Koehler-Dayton
P.O. Box 309
South Street
New Britain, CT 06050
(203) 225-3501
Waste management systems and technology for the transportation and related capsulated population industry, including ships, aircraft, trains, recreational homes, marinas and other applications.

Lambda Optics
20 Locust Avenue
Berkeley Heights, NJ 07922
(201) 464-5080
Sale of laser rods to the research and industrial markets

Landis-Gendron
37 rue Colin
69 Villeurbanne, Rhone, France
(78) 84-74-57
Precision cylindrical grinding machines and disc grinders

Landis Lund
Cross Hills
Yorkshire, Great Britain BD20 7SD
(5353) 33211
Precision cylindrical grinding machines and disc grinders

Landis Tool
East Sixth Street
Waynesboro, PA 17268
(717) 762-2161
Precision cylindrical grinding machines

Larsen-Hogue
11510 South Alameda Street
Los Angeles, CA 90059
(213) 636-3271
Sales and service of industrial electrical apparatus including motors, transformers and generators.

Lehigh-Leopold
2825 Mt. Pleasant Street
Burlington, IA 52601
(319) 753-2271

also
150 East 58th Street
New York, NY 10022
(212) 593-0900
Wooden and upholstered office furniture

Liberty Wire
2303 Wisconsin Avenue
Downers Grove, IL 60515
(312) 242-4420
Magnetic wire, bunched and stranded copper wire, bare and tinned

LITAL
(Litton Italia S.p.A.)
(Guidance & Control Systems division)
Via Pontina km 27,300
Mail to: Casella Postale 10064 EUR
1-00040 Pomezia (Rome), Italy
(6) 912-0651
Inertial navigation systems for aircraft; mini computers

LITEF (Litton Technische Werke)
Lorracher Strasse 18
Postfach 774
D-7800 Freiburg, Germany
(0761) 49011
Inertial navigation systems, marine navigation systems; attitude and heading reference systems; gyroscopes and accelerometers; digital computers, interface electronics.

also
Wachsbleiche 12
D-5300 Bonn, Germany
(2221) 658051

Litton ABS (See Sweda International)

Litton ABS McBee division (See Kimball Systems)

Litton Clonetics
5516 Nicholson Lane
Kensington, MD 20795
(301) 881-5800
Biomedical services in life science research, clinical laboratory testing services, health care delivery system studies.

Litton BTS (Business Telephone Systems)
500 Macara Lane
Sunnyvale, CA 94086
(408) 732-3313
Private telephone interconnect systems and services for a wide range of business applications, including telephone communication and switching (PABX) systems.

Litton Business Equipment Holdings
330 William Street
Melbourne 3000, Australia
Melbourne 329-6048
Sales and service of Royal, Royfax, Monroe, Litton ABS, Sweda, Kimball and McBee products

Litton Business Systems (Austria)
Wiedner Hauptstrasse 23-25
A-1040 Vienna IV, Austria
65 27 79
Sales and service of Sweda sales registers.

Litton Business Systems (Belgium)
59, Rue du Bon Pasteur
1140 Brussels, Belgium
(2) 168050
Sales and service of Sweda sales registers and Kimball systems.

Litton Business Systems (France)
9-15 Avenue Paul Doumer
Boite Postale 105
92504 Rueil-Malmaison, France
977 92 45
Sales and service of Monroe, Royal, Sweda and Kimball products.

Litton Business Systems (Germany)
Am Heerdter Hof 11/13
Postfach 5128
4000 Dusseldorf 1, Germany
(0211) 50 82-1
Sales and service of Monroe, Sweda and Kimball products.

Litton Business Systems (Great Britain)
Litton House
52/56 Buckingham Street
Aylesbury, Bucks, Great Britain
(296) 84140

also
27 Goswell Road
London EC1M 7AL, Great Britain
(1) 253 3090
Sales and service of Monroe, Kimball and Sweda products.

Litton Business Systems (Holland)
Hoofdkantoor, Brouwerstraat 4
P.O. Box 224
Amersfoort, Holland
(03490) 30169

Litton Business Systems—Kimball (Italy)
Viale Monza 261
I-20126 Milan, Italy
(02) 25 23
Sales and service of Kimball tags, labels and equipment.

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Litton Business Systems—Monroe (Italy)
[illegible] Vittorio 42
[illegible] Corsico, Italy
[illegible] 651
Sales and service of Monroe and Sweda (Litton Allied) products

Litton Business Systems/Royal-Imperial (Italy)
[illegible] Famagosta 75
[illegible] 42 Milan, Italy
[illegible] 341
Sales and service of Royal-Imperial typewriters and Royal Bond and Royfax copiers

Litton Business Systems (Portugal)
[illegible] da Republica, 52 B
[illegible] 1, Portugal
[illegible] 7/8
Sales and service of Monroe, Sweda and Royal products

Litton Business Systems (Spain)
[illegible] Morales 13
[illegible] Spain
[illegible]
Sales and service of Sweda and Kimball products

Litton Business Systems (Sweden)
[illegible] vagen, 2, Fach
[illegible] Sundbyberg 3, Sweden
[illegible] 981100
Sales and service of Sweda, Monroe and Kimball products

Litton Business Systems (Switzerland)
[illegible] strasse 123
[illegible] 310
[illegible] Zurich, Switzerland
[illegible] 96 00
Sales and service of Sweda and Kimball products

Litton Dental Products
[illegible] Moffat Drive
[illegible] P.O. Box 7263
[illegible], OH 43615
[illegible] 841-7751
Dental equipment and supplies

Litton Educational Publishing
[illegible] 33rd Street
[illegible], NY 10001
[illegible] 594-8660
Textbooks, special materials and programs for the entire spectrum of education

Litton European Offices
[illegible] strasse 28
[illegible] Zurich, Switzerland
[illegible] 48 35 44
Administrative headquarters for Litton corporate activities in Europe

Litton Fastening Systems
[illegible] Paramount Boulevard
[illegible]wood, CA 90712
[illegible] 421-3711
Precision fasteners for industry, high strength and high temperature, self-locking Orlom fasteners, hydraulic components, swivels, extensions and fittings.

Litton Financial Printing
[illegible] Montgomery Street
[illegible] Francisco, CA 94104
[illegible] 949-5417
Administrative headquarters for Litton Financial Printing operations

[illegible] East Slauson Avenue
[illegible] Angeles, CA 90040
[illegible] 723-1900
Business and personal checks, forms and passbooks, payroll check systems, accounts payable systems, plastic items, PolyScriptions

[illegible]
[illegible] W. Ogden Avenue
[illegible]ville, IL 60540
[illegible] 355-1980
Check printing—special, regular personal, commercial, bank forms

Litton Industries Credit Corporation
[illegible] Summer Street
[illegible]rd, CT 06902
[illegible] 359-2700
Financing provided for Litton products and Litton leased products through lessee and dealership agreements

Litton International S.A.
[illegible] strasse 28
[illegible] Zurich, Switzerland
[illegible] 48 35 44
Holding company

Litton Italia (Business Equipment Division)
[illegible] Piemonte 27-800
[illegible]040 Pomezia (Rome), Italy
[illegible] 10
[illegible]la Postale 10064 EUR
[illegible]00 Rome, Italy
[illegible] 20551
Distribution of Sweda cash registers and electronic point-of-sale systems

Litton Medical Electronics
10819 Franklin Avenue
Franklin Park, IL 60131
(312) 451-1487
Marketing of Heritage medical electronics

Litton Medical Systems
515 East Touhy Avenue
Des Plaines, IL 60018
(312) 296-4488
X-ray equipment including X-ray tables, generators, film processors, serographs, mobile diagnostic units, tubes, tube stands and film processing chemicals. Distributor of cobalt therapy units, microradiology systems, linear accelerators for therapy and mobile X-ray machines, thermography equipment and ultrasonic diagnostic devices.

Litton Memory Products
8320 Deering Avenue
Canoga Park, CA 91304
(213) 884-4600
Memory stacks and systems for commercial and military applications.

also
215 A Boon Keng Road
Kallang Industrial Estate
Singapore 12
53 22 33
Memory systems, memory core planes and stacks

Litton Microwave Cooking Products
400 Shelard Plaza South
Minneapolis, MN 55426
Exec. Offices (612) 553-2200
Toll free (800) 328-7777
Microwave ovens and accessory products for commercial, institutional, vending and home use.

Litton Microwave Cooking Products (Canada) Ltd.
50 Galaxy Road
Rexdale, Ontario, Canada
(416) 677-7051

Litton Microwave Cooking Products Ltd.
18/19 Regent Parade
Brighton Road
Sutton, Surrey, Great Britain
(1) 643 7211

Litton Microwave Cooking Products
6 Frankfurt 71
Lyoner Strasse 11
Postfach 710346
Frankfurt, West Germany
679021 ext. 85/87
Marketing of microwave ovens to commercial catering and consumer distribution outlets.

Litton Precision Gear
4545 South Western Boulevard
Chicago, IL 60609
(312) 847-4211
Precision gears and aircraft parts

Litton Precision Products International
Gubelstrasse 28
8050 Zurich, Switzerland
(01) 48 35 44
Headquarters for European offices of LPPI

Litton Precision Products International (Austria)
Hitzinger Hauptstrasse 146/III/1
A-1130 Vienna, Austria
Vienna 8246793

Litton Precision Products International (France)
120 Avenue des Champs-Elysee
F-75 Paris 8, France
(1) 225-5472

Litton Precision Products International (Germany)
Oberfohringer Strasse 8
D-8 Munich 80, Germany
(811) 980547

Litton Precision Products International (Great Britain)
95 High Street
Slough, Bucks., Great Britain
Slough 28267

Litton Precision Products International (Holland)
Steenloperstraat 26
Capelle a/d Yssel, Holland
50 39 02

Litton Precision Products International (Italy)
Via Arco 4
I-20121 Milan, Italy
(2) 89 33 62

Litton Precision Products International (Sweden)
Artillerigatan 91-93
Fack
S-100 51 Stockholm, Sweden
(8) 142345

Litton Publications
550 Kinderkamack Road
Oradell, NJ 07649
(201) 262-3030
Professional publications, directories, compendia in the fields of medicine, nursing, pharmacy, clinical laboratories and product management

Litton Reston Computer Center
1831 Michael Faraday Drive
Reston, VA 22090
(703) 471-9200
Computer processing and related services, time sharing, remote job entry, computer programming, data base system design

Litton Systems (Canada)
25 Cityview Drive
Rexdale, Ontario, Canada
(416) 249-1231
Inertial navigation systems, weapons delivery computers and systems, aerospace ground equipment, tactical data systems, precision electromechanical devices, electronic control systems, engineering development and product support.

Litton UHS (Unit Handling Systems)
7100 Industrial Road
Florence, KY 41042
(606) 371-8410
Unit handling conveyor systems and equipment, automated warehousing systems.

Conveyor Operations
7100 Industrial Road
Florence, KY 41042
(606) 371-8430
Unit conveyor systems and equipment, overhead conveyor systems.

Iron Gal Operations
3101 Old Hayneville Road
Montgomery, AL 36108
(205) 269-2355
Pallet loading and unloading equipment for material handling systems.

Litton Washington, D.C., Office
Litton Industries
490 L'Enfant Plaza S.W.
Washington, DC 20024
(202) 554-2570
Headquarters for Litton corporate activities in Washington, D.C.

Litton World Trade Corporation
Gubelstrasse 28
8050 Zurich, Switzerland
(01) 48 35 44
Development of Litton trade with Mideast and Eastern countries

Louis Allis
427 East Stewart Street
Milwaukee, WI 53201
(414) 481-8000
Electric motors, industrial, 1/10,000 HP, AC and DC, standard and engineered drives and systems, rotating and solid state adjustable.

Lucas Machine
12302 Kirby Avenue
Cleveland, OH 44108
(216) 451-5588
Boring, milling and drilling machines (horizontal and vertical), largely equipped with numerical controls, vertical NC profilers for contour milling of titanium and super alloys, special machinery systems.

Maverick-Clarke
2643 Mossrock Road
San Antonio, Tx 78230
(512) 341-9111
Office machines, supplies and furnishings, printing, office planning service.

McBee-Canada
179 Bartley Drive
Toronto 16, Ontario, Canada
(416) 755-2244
Manual accounting and posting systems, with supporting machines and equipment. Sweda (Litton ABS) electronic business machines.

McBee Loose Leaf Binder Products
424 North Cedarbrook Avenue
Springfield, MO 65801
(417) 866-0822
Business binders including ring binders, sales catalogs, price books, procedure manuals, computer printout binders, proposal covers, custom and specialty products and indexes.

McBee-Mexico
47 Bahio de San Hypolita
Apartado 28925
Mexico D.F. 17
Mexico City 531-4979
Distributor of Kimball (McBee) products

McCormick-Mathers
450 West 33rd Street
New York, NY 10001
(212) 594-8660
Textbooks and educational materials for elementary and secondary schools.

Mellonics
1001 West Maude Avenue
Sunnyvale, CA 94086
(408) 245-0795
Services and systems: computer programming and software development, data systems design, systems engineering and engineering services, operations analysis, technical communication programs, systems operational test and evaluation, electronic warfare computer program development.

Merriman
100 Industrial Park Road
Hingham, MA 02043
(617) 749-5100
Textile rings, self-lubricating construction bearings, powdered metal parts, helical gears,

Mijnhardt
Singel 45
Delft, Holland
(31 15) 12 28 80
Medical instruments for lung-function testing and ergometry.

Mogendorff N.V.
Marconistraat 7, P.O. Box 70
Zevenaar, Holland
(08360) 24941
Famos label marking machines, tags and labels of self adhesive and heat-seal paper, cardboard and P.V.C., automatic dispensers and printing units, hand pricers.

also
Chr. SAAR GmbH
Famos Etikettenfabrik
Industriestrasse
Mail to: P.O. Box 1227
Ritten 4244, West Germany
(02828) 2068

Monroe, the Calculator Company
550 Central Avenue
Orange, NJ 07051
(201) 673-8600
Electronic programmable desktop calculators and mini-computers for business and technical use; electronic calculators for general business, hand-held calculators; adding machines.

Monroe (Canada)
4500 Dixie Road
Mississauga, Ontario L4W 1V7, Canada
(416) 625-7240
Sales and service of Monroe office calculators, adding and accounting machines.

Monroe (Far East)
P.O. Box 6475
Kowloon, Hong Kong
K663-68, K684076
Back-up service for Monroe products, training of Monroe technicians for Asiatic-Pacific dealers.

Monroe Venezolana
Apartado Postal 6678
Caracas, Venezuela, Zona 101
574-0706, 574-0306
Sales and service of Monroe calculators, Royal typewriters

Nationale Etikettenfabriek B.V.
Sterrescharreweg 56-57
Nijmegen, Holland
(080) 228477
Tags and labels

New Britain-Amtse U.K.
48 Queens Road
Coventry CV1 3EH, Great Britain
(203) 26306
Machine tool sales and service throughout the U.K., Scandinavia and The Netherlands.

New Britain Machine
South Street
New Britain, CT 06050
(203) 229-1641
Single and multiple spindle automatic bar machines, chucking machines, horizontal single and multiple spindle; and numerically controlled chucking machines, contour turning and boring machines, friction welding machines and special machines.

also
Lund Industrial Road
Saco, ME 04072
(207) 282-3338
Machine tool components and attachments; plastics injection molding machines.

New Britain Plastics Machine
129 Worthington Ridge
Berlin, CT 06037
(203) 829-0561
Plastics injection molding machines, process controls and computer controls.

Olympic Office Supply
505 Broadway
New York, NY 10012
(212) 966-2900
Office supplies and furniture, printing, advertising specialties.

Oxley & Whitney
130 Southampton Road
Westfield, MA 01085
(413) 568-2401
Molds for plastics and die cast parts.

Papeterie De Vuzelle
1290 Versoix-Geneva, Switzerland
(22) 55 10 55
Production of offset, continuous form, writing and envelope paper

Exhibit C – Copy of Litton Industries World Wide Directory of Operations and Products – Winter 1974/75 attached to Logan-Baldwin Affirmation.

C. Plath
...gstrasse 46
...burg 80, Germany
... 27 10 31

...ced and conventional marine navigational ...uipment, including gyro compasses, auto... pilots, electronic man-steering systems, ...e-off-sum indicators, radio navigation equip...ment ENI-tags sextants, magnetic compasses ...d general nautical instruments

Plimpton's
...Farmington Avenue
...ford, CT 06103
... 522-2291

...ce supplies, machines and furniture printing, ...tographic supplies and equipment

Poly-Scientific
... North Main Street
...sburg, VA 24060
... 552-3014

...ing assemblies, miniature to large for all ...cations including carbon instrumenta... inertial navigation, helicopter de-icing, ...pe reels, radar pedestals, high speed tur... testing and hard vacuum rotary switches, ...ridrotors devices and related components

Potentiometer
...5 East Third Street
...n Vernon, NY 10550
... 664-7733

...ision potentiometers and precision rheostats ...rotary, multiturn and single- ...rectilinear ...d sector types, pendulum transducers, re... stors, rotary switches, servo motors, Com... ...fe crane warning systems and ...ted sens... ...g systems.

RCS S.P.A.
...ragrazione di Cossa Svedese S.P.A.
...Leonardo da Vinci 154/162
...090 Milano Trezzano, Italy
... 44 52 051/5

...keting of Sweda sales registers

Reed Rolled Thread Die
...strial Park
...ton, MA 01520
... 829-4491

...ead rolling machines, dies, attachments, ...ead rolls and knurls

Robins Engineers & Constructors
... Union Boulevard
...bes, NJ 07512
... 256-7800

...gn and installation of bulk material handling ...systems, including belt conveyor systems, and ...nding, storage and reclaiming systems

Royal
... New Park Avenue
...rford, CT 06106
... 523-4891

...ing and manual office and portable type... ...writers, adding machines, hand-held elec... ...calculators, Royfax electrostatic copiers ...and Royal Bond plain paper copiers, computer ...systems

Royal (Canada)
... Belmount Road
...ugh, Ontario, Canada
... 7431

...s and service of Royal electric and manual ...e and portable typewriters, calculators, ...fax electrostatic copiers and Royal Bond ...laser copiers, computer typing systems.

Royal-Imperial International
...er Strasse 11
... 710449
...sheim/Main-Niederrad, Germany
...67 80 21

...ng headquarters in Europe for Royal-... ...ns electronic calculators, Royal-Imperial ...writers, Royfax electrostatic photocopiers ...supplies and Royal Bond plain paper ...ers

...
...29 Rue des Poissonniers
...Neuilly-sur-Seine, France
...47 4812

...a Famagosta 75
...16 Milan, Italy
...45341

Royty...
...View Britain Avenue
...Hartford, CT 06110
... 523-4581

...fabric and film ribbons for all business ...ines and computers, impression form and ...paper for typewriters, billing machines ...control carbon applications

Standard Desk
... St-Martin Boulevard
... Quebec, Canada
... 663-3930

...e and general office furniture, uphol... ...office seating in wood and metal, ...LVE modular furniture systems

Sterimed
...anger Strasse 155
...ytech 943
...6600 Saarbrucken 3, Germany
...68 66 16

...sposable medical tubes and catheters

Streator
411 South First Avenue
Albert Lea, MN 56007
(507) 373-7611

Store planning consultation including planning, decor design, fixture manufacturing, installation and financing for independent discount, chain and department stores

Streator Design
28 North Fifth Street
Minneapolis, MN 55403
(612) 335-8981

Interior design for the retail industry, support capabilities in architecture, interior and exterior space planning, and production of interior decor materials

Sturgis Newport
905 G Street
Mail to: P.O. Box 9249
Hampton, VA 23670
(804) 245-3246

Salesbooks, continuous forms, register forms, unit sets

Svenska Dataregister
Trosshagen 9, P.O. Box 1200
S-17123 Solna 1, Sweden
(08) 289420

Sweda electromechanical sales registers and related retail automation equipment

Sweda International
34 Maple Avenue
Pine Brook, NJ 07058
(201) 575-8100

Electronic and electromechanical cash register systems. Litton ABIS electronic business systems utilizing mini-computers

also

P.O. Box 2206-R
Morristown, NJ 07960
(201) 540-0500

Research and development of electronic point-of-sale systems and electronic business systems

Sweda de Mexico
Guillermo Prieto 77-A
Mexico City 4, D.F., Mexico
56-03-66

Sales and service of Sweda sales registers

Sweda International, Canada
46 Chauncey Avenue
Toronto 570, Ontario, Canada
(416) 239-4355

Sales and service of Sweda sales registers

Triad-Utrad
305 North Briant Street
Huntington, IN 46750
(219) 356-7100

Transformers, high voltage power supplies, deflection yokes, inductors, converter/battery chargers, inverters-ballasts, and ferro-resonant transformers for microwave ovens

also

118 West 35th Street
National City, CA 92050
(714) 425-2100

Battery chargers for hand held calculators, small tools and other devices, converter-battery chargers for marine applications, ferro resonant transformers and power supplies

Triumph-Adler Bureauequipment
42, rue Laugier
F-75 Paris 17e, France
(1) 267 45 57

Sales and service of Triumph-Adler typewriters, accounting machines and electronic calculators

Triumph-Adler Business Systems
Viale Monza 261
20126 Milan, Italy
(02) 25 23

Sales and service of Triumph-Adler products

Triumph-Adler Vertriebs-GmbH
Further Strasse 212
D-8500 Nuremberg, Germany
(911) 32021

Marketing and distribution of Triumph and Adler products, including typewriters, mini-computers, calculators, adding machines and word processing equipment. Subsidiaries in Australia, England, France, Italy and the United States

Triumph Werke Nuernberg AG
Further Strasse 212
D-8500 Nuremberg, Germany
(911) 32021

Research, development and production of manual and electric portable and office typewriters, accounting machines and mini-computers

Twin City Tool
1001 West U.S. 56 Highway
Olathe, KS 66061
(913) 782-2200

Medical X-ray parts, dental X-ray chairs and units, X-ray tube parts and precision equipment

Union/Butterfield
134 Chestnut Hill Avenue
Athol, MA 01331
(617) 249-3221

Drills, cutters, hobs, reamers, carbide tools, taps, dies, counterbores, and mills

also

Derby Line, VT 05830
(802) 873-3106

Drills, taps and dies, reamers, end mills, cutters, and hobs in high-speed steel, also carbide tipped and solid carbide

also

Belt Line Road
Mail to: P.O. Box 1239
Gaffney, SC 29340
(803) 489-5751

Drills for the metalworking industry

Union Chain
West Monroe Street
Sandusky, OH 44870
(419) 626-4560

Engineering chain

USECO
13536 Saticoy Street
Van Nuys, CA 91409
(213) 786-9381

Standard and custom screw machine products, terminals, spacers, inserts, knobs, handles, jacks, pins and terminal boards. Standard and custom molded products, connectors, headers and insulated terminals. Custom electromechanical assemblies, card cages, connectors and back panel frames

Valentine
P.O. Box 280
Lockport, LA 70374
(504) 532-3313

Production of offset printing and tablet paper from bagasse, a by-product from cane sugar production

D. Van Nostrand
450 West 33rd Street
New York, NY 10001
(212) 594-6660

College textbooks and materials

Van Nostrand Reinhold
450 West 33rd Street
New York, NY 10001
(212) 594-6660

Professional and reference books in science and technology. Trade books in architecture and interior design, art education, art instruction, business, color and design, cooking, general crafts, gardening, graphic design and advertising, health, hobbies and games, lapidary and jewelry, music, nautical, needlecraft, weaving and textiles, photography and films, pottery and ceramics, sports, theater

Van Nostrand Reinhold Australia
P.O. Box 53, Mitcham
Victoria 3132, Australia
Melbourne 88-49-23

Distributor in Australia and New Zealand of books published by Litton Educational Publishing

Van Nostrand Reinhold Canada
1410 Birchmount Road
Scarborough, Ontario M1P 2E7, Canada
(416) 751-2800

Distributor in Canada of books published by Litton Educational Publishing

Van Nostrand Reinhold Ltd.
25-28 Buckingham Gate
London SW 1E 6LO, Great Britain
(1) 834 3726/9

Educational books in the fields of science, technology, education, arts and crafts

Veam
Via Statuto 2
I-20020 Arese Milan, Italy
(02) 93 80 212, 93 80 195

Electronic cylindrical connectors

VocaGonal, Technical and Industrial Publishing
50 Wolf Road
Albany, NY 12205
(518) 459-1150

Vocational and technical textbooks

Western Geophysical
6100 Westpark Drive
Houston, TX 77042
Mail to: P.O. Box 2469
Houston, TX 77001
(713) 781-3261

Land and marine geophysical seismic surveys for petroleum industry, processing and interpretation of field data at five digital service centers

Western Geophysical (Australia)
35 Outram
Mail to: P.O. Box 129
West Perth, Western Australia 6005
219 942

Western Geophysical (Canada)
530 71st Avenue S.E.
Mail to: P.O. Box 5250 Station A
Calgary 9, Alberta, Canada
(403) 253-7101

Western Geophysical (Great Britain)
Wesgeco House
268/290 Worton Road, Isleworth, Middx.
Great Britain
(1) 568-7391

Western Ricerche Geofisiche S.p.A.
Piazza della Repubblica 32
I-20124 Milan, Italy
(02) 63 84 45/6

Westrex
7800 Westpark Drive
Mail to: P.O. Box 1939
Houston, TX 77042
(713) 784-5800

also

390 North Arguello Drive
Mail to: P.O. Box 580
Beverly Hills, CA 90213
(213) 274-9303

Manufacture, sale and maintenance of recording equipment for recording studios and projection equipment for theaters, projector carbons, teletype equipment for peripheral computer application and public address system equipment

Westrex Asia
31 Queen's Road Central
Hong Kong
H-238259, H-232538

Sales and service of Westrex, Sweda and Kim ball products

Westrex Asia
International House
Hsin Yee Road-Section 3
Taipei, Taiwan
773151/2

Sales and service of Litton products

Westrex Company East
Dumit Building
Hamra Street
Beirut, Lebanon
25 15 79

Theater projection equipment, sound recording equipment, teletype and theater services

Westrex Iberica
Avenida Jose Antonia 636
Barcelona 7, Spain
231 50 02

Cinema projection equipment and sound equipment, closed circuit television and studio recording equipment

Westrex Italy
65, Via Constantion Maes
I-00162 Rome, Italy
83 92 990

Sound recording and reproducing equipment for television and motion picture studios

Westrex Ltd.
152 Coles Green Road
Cricklewood
London NW2 7HE, Great Britain
(1) 452 5401

Headquarters for Westrex international operations and all Westrex activities outside the U.S. Manufacture, sale and maintenance of recording equipment for recording studios and projection equipment for theaters, projector carbons, teletype equipment for peripheral computer application, public address systems

Westrex Orient
Chiyoda Building
1-2, 2-chome, Marunouchi, Chiyoda-ku
Mail to: Central P.O. Box 760
Tokyo, Japan
(3) 1-6791/8

Distribution of Litton products, purchase of products manufactured in Japan for export to Litton divisions, technical licensing, exchange of technology and distribution of products between Litton divisions and Japanese firms.

Winchester Electronics
Main & Hillside Avenue
Oakville, CT 06779
(203) 274-5891

Electronic and electrical connectors for computers and other industrial, commercial and military uses; back panel wirewrap and design, connector accessories and tools, insulated terminals.

also

Alte Neckargartacher Strasse
D-7101 Bibersach/Heilbronn, Germany
(7066) 81 12/3

Manufacture of electronic and data processing connectors.

Xcel Mold and Machine
7661 Freedom Street
North Canton, OH 44720
(216) 499-8450

Molds for plastics and diecast parts

Exhibit C – Copy of Litton Industries World Wide Directory of Operations and Products – Winter 1974/75 attached to Logan-Baldwin Affirmation.

nternational Divisions and Major Offices

ustralia

Business Equipment Holdings
Nederland Reinhold
Western Geophysical

ustria

Business Systems
Precision Products International

elgium

Systems
Farmaco
Business Systems

anada

Canada
Canada
Robins
Sutter
Systems Canada
Systems (Canada)
Canada

Desk
International
Geophysical

rance

Products
France
France
Gendron
Business Systems
Precision Products International
Imperial International
Adler Bureauequipment

ermany

Systems
Sass Wolf
Business Systems
Microwave Cooking Products
Precision Products International
Imperial International
Adler Vertriebs-GmbH
Werke Nuernberg AG
Electronics

olland

Business Systems
Precision Products International
Nationale Etikettenfabriek

ong Kong

(Far East)
Asia

ran

Systems

rael

Catalog

taly

Systems
Italia
Business Systems—Kimball
Business Systems—Monroe
Business Systems/Royal-Imperial
Italia
Precision Products International
S.P.A.
Imperial International
Adler Business Systems

Ricerche Geofisiche
Italy

Japan

Data Systems
Westrex Orient

Lebanon

Aero Products
Westrex Company East

Mexico

McBee Mexico
Sweda de Mexico
Triad de Mexico

Philippines

American Book

Portugal

Litton Business Systems

Singapore

Electron Tube
Kester Solder
Litton Memory Products

Spain

Heliige
Litton Business Systems
Westrex Iberica

Sweden

Litton Business Systems
Litton Precision Products International
Svenska Dataregister

Switzerland

Litton Business Systems
Litton European Offices
Litton International S.A.
Litton Precision Products International
Litton World Trade Corporation
Papeterie De Versoix

Taiwan

Westrex Asia

United Kingdom

Aero Service
Datalog
Eureka Marketing Systems
Imperial Typewriter
Kimball/U.K.
Landis Lund
Litton Business Systems
Litton Microwave Cooking Products
Litton Precision Products International
New Britain-Amtec U.K.
Van Nostrand Reinhold
Western Geophysical
Westrex

Venezuela

Monroe Venezolana

United States Divisions

Alabama

Litton UHS (von Gal Operations)

California

Aero Products
Aero Service
Atlas Stationers
Carlisle
Data Systems
Electron Tube
Encoder
Guidance & Control Systems
Inter/Pak
Kimball/M&M
Larsen-Hogue
Litton BTS (Business Tel. Systems)
Litton Fastening Systems
Litton Financial Printing
Litton Industries Corporate Offices
Litton Memory Products
Mellonics
Triad-Utrad
USECO
Westrex

Connecticut

Conformatics
Eldors Tool
Hand Tools Division
Koehler-Dayton
Litton Industries Credit Corporation
New Britain Machine
New Britain Plastics Machine
Pumpton s
Royal
Royltype
Winchester Electronics

D.C.

Litton Washington D.C. Office

Illinois

Eureka X-Ray Tube
Gardner Machine
Jefferson Electric
Kester Solder
Liberty Wire
Litton Financial Printing
Litton Medical Electronics
Litton Medical Systems
Litton Precision Gear
Litton Medical Systems

Indiana

Triad-Utrad

Iowa

Lehigh-Leopold

Kansas

Twin City Tool

Kentucky

Litton UHS
Litton UHS (Conveyor Operations)

Louisiana

Valentine

Maine

New Britain Machine

Maryland

Amecom
Litton Bionetics

Massachusetts

Boston L.O.P.C. (Litton Office Products Center)
Decotone
Fitchburg
Hand Tools Division
Merriman
Osley & Whitney
Reed Rolled Thread Die
Union/Butterfield

Minnesota

Litton Microwave Cooking Products
Streater
Streater Design

Mississippi

Ingalls Shipbuilding

Missouri

Advanced Circuitry
McBee Loose Leaf Binder Products

New Jersey

Adler Business Machines
Aurion
Hewitt-Robins Passaic
Kimball Systems
Lambda Optics
Litton Publications
Monroe
Robins Engineers & Constructors
Sweda International

New York

American Book
D. Van Nostrand
Datalog
Deimar
Litton Educational Publishing
McCormick-Mathers
Olympic Office Supply
Potentiometer
Van Nostrand Reinhold
Vocational, Technical and Industrial Publishing

Ohio

Litton Dental Products
Lucas Machine
Litton Chain
Xcel Mold and Machine

Pennsylvania

Aero Service
Clifton Precision
Clifton Special Devices
Cole
Fitchburg Coated Products
Landis Tool

South Carolina

Hewitt-Robins Columbia
Union/Butterfield

Texas

Aero Service
Digital Data Systems
Maverick-Clarke
Western Geophysical
Westrex

Vermont

Union/Butterfield

Virginia

Everett Waddey
Litton Reston Computer Center
Poly-Scientific
Sturgis Newport

Wisconsin

Louis Allis

Litton Industries Corporate Offices
360 North Crescent Drive
Beverly Hills, California 90210
(213) 273-7880
Toll-free numbers for information calls:
(800) 421-0768 for calls outside California
(800) 252-0222 for calls within California



Exhibit D – Employment Application Form of McBee Systems attached to Logan-Baldwin Affirmation.

McBEE SYSTEMS
Litton Division of Haverhill Systems

APPLICATION FOR SALES POSITION

(All Information Will Be Treated Confidentially)

AN EQUAL OPPORTUNITY EMPLOYER WITH A WRITTEN AFFIRMATIVE ACTION PROGRAM

Please Print In Ink

Last Name	First	Middle (Maiden)	Telephone No.

LIST HOME ADDRESSES FOR LAST 5 YEARS

#	Street	City	State	Zip	From Mo.	From Yr.	To Mo.	To Yr.

Driver's License No.	State	Expire Date	Type	Number of Points for Violations	Social Security No.

Have you ever worked with or for by any Division of Litton Industries? If yes, where and when?

Names of Friends or relatives employed by Litton Industries

Are you in this country on a Temporary Visa? ☐ Yes ☐ No

Have you ever been convicted of a crime? (If yes, state for what, where, when) ☐ Yes ☐ No

Are you willing to travel: ____ % of Time

Is there any reason you would not be willing to relocate?

Is there any reason why you would not furnish a Fidelity Bond at our expense.

Position Applied for

Earnings Expected

Why are you applying for this position?

EDUCATION

	Name of School	Location (City, State)	From Mo.	From Yr.	To Mo.	To Yr.	Major	Degree
High School								
College								

JOBS WHILE IN SCHOOL AND DURING SUMMERS

Employer	City and State	Your Job	Your Salary	From	To	Hours Per Wk.

Scholastic Standing: High School ____ % Top ____ % of Class; College ____ % Top ____ % of Class

How many years did you attend evening classes?

What part of the expenses did you earn? ____ %

A) What languages other than English do you speak

B) do you read

C) do you write

Extra Curricular Activities, Honorary Societies and Scholarships you have received

Military Service

ABJ R1

Exhibit D — Employment Application Form of McBee Systems attached to Logan-Baldwin Affirmation.

From	To	Total Time Yrs. Mo.	Last or Present Employer	Telephone No.
Address	Street	City	State	Name of your Immediate Superior
Kind of Business				His Title:
Nature of Work at Start				Monthly Earnings at Start
Nature of Work at Leaving				Monthly Earnings at Leaving
How did you obtain this job?				Method(s) of Compensation ☐ Salary ☐ Commission ☐ Other
Reasons for Leaving:				

From	To	Total Time Yrs. Mo.	Previous Employer	Telephone No.
Address	Street	City	State	Name of your Immediate Superior
Kind of Business				His Title:
Nature of Work at Start				Monthly Earnings at Start
Nature of Work at Leaving				Monthly Earnings at Leaving
How did you obtain this job?				Method(s) of Compensation ☐ Salary ☐ Commission ☐ Other
Reasons for Leaving:				

From	To	Total Time Yrs. Mo.	Previous Employer	Telephone No.
Address	Street	City	State	Name of your Immediate Superior
Kind of Business				His Title:
Nature of Work at Start				Monthly Earnings at Start
Nature of Work at Leaving				Monthly Earnings at Leaving
How did you obtain this job?				Method(s) of Compensation ☐ Salary ☐ Commission ☐ Other
Reasons for Leaving:				

From	To	Total Time Yrs. Mo.	Previous Employer	Telephone No.
Address	Street	City	State	Name of your Immediate Superior
Kind of Business				His Title:
Nature of Work at Start				Monthly Earnings at Start
Nature of Work at Leaving				Monthly Earnings at Leaving
How did you obtain this job?				Method(s) of Compensation ☐ Salary ☐ Commission ☐ Other
Reasons for Leaving:				

BEST COPY AVAILABLE

Exhibit D — Employment Application Form of McBee Systems attached to Logan-Baldwin Affirmation.

Have you ever served in the U.S. armed forces? ☐ Yes ☐ No	Branch of Service	Rank Upon Entry
Have you received notice to report for duty in the armed forces? ☐ Yes ☐ No		Rank Upon Discharge

What Citations and Awards have you received?

Special training or duties which you feel might be helpful in a career with McBee Systems.

Do you presently receive any income for or because of your military service? ☐ No ☐ Yes	What Amount?	For what reason?

SPECIAL ACTIVITIES

(List past or present activities since leaving school (excluding organizations of a racial, religious or foreign national character as well as labor unions).

Type of Organization	Name or Description of Organization	When Did You Actively Participate? From	To	Offices Held During Last Five Years	Average Time Now Given Per Week
Business or Professional Activities					
Civic or Community Organizations					
Lodges, Fraternities Sororities, Social Groups					
Other					

What are your hobbies and recreational activities?

PHYSICAL RECORD	What is your present physical condition?	Height	Weight

What physical handicaps or limitations do you have?

List serious illnesses, operations, accidents, nervous disorders and approximate dates

Do you suffer from: ☐ Defective Hearing, ☐ Defective Sight, ☐ Rupture, ☐ Tuberculosis, ☐ Rheumatism, ☐ Asthma, ☐ Flat Feet, ☐ Heart Trouble, ☐ High Blood Pressure, ☐ Ulcers, ☐ Diabetes, ☐ Malaria, ☐ Headaches, ☐ Indigestion ☐

When did you last see a doctor?	Why	Are you willing to take a physical exam at our expense? Yes ☐	No ☐

Insured by Employer $	Life Insurance Carried by You $	Accident Insurance $	Auto Collision Ins. $	Public Liability Ins. $

In case of emergency, who should be notified? (Name and Address) | Telephone No. | Relationship

What is your present home rating?	Do you own your home? ☐ No ☐ Yes	Value $	Mortgage Bal. $	Mortgage Payment $
☐ Rental Agency ☐ Partial Ownership ☐ Rent a Room? ☐ Other				Monthly Rental

What car do you own?	Year	What do you owe on it? $	Car Furniture, Etc. $	Other $
Total Monthly Payments (Auto, Furniture, Etc.) $	Which Year?	Date And Time to Start Work	Notice Required	

Exhibit D — Employment Application Form of McBee Systems attached to Logan-Baldwin Affirmation.

REFERENCES

Exclude relatives but give (2) persons not previously mentioned who are most familiar with your habits, ability, training and character.

Name of Reference	Address No. Street City State Zip	Occupation or Position

What are your goals for the next 2 years?

What are your 5 and 10 year goals?

I UNDERSTAND THAT ANY FALSE STATEMENTS IN THIS APPLICATION SHALL BE SUFFICIENT CAUSE FOR MY REJECTION OR DISMISS

I hereby agree to permit McBee® Systems to investigate all of the information on this application, and further agree not to hold any previous employer or other reference responsible for information given to McBee Systems.

I agree to submit to a physical examination by the company's physician or if otherwise directed by another duly-registered physician.

I agree to observe and comply with all policies, rules and regulations of the company.

I understand that any employment given me by McBee Systems will be probationary for _____ days.

APPLICANT'S SIGNATURE _____ DATE _____

Applicant Not To Use Space Below

SUMMONS, dated 4-8-76, Served with Complaint (same as Complaint dated 12-29-76), with Notice to Produce (same as Notice to Produce filed 12-31-75), and with Amended Complaint (same as Amended Complaint dated 3-18-76).

SUMMONS IN A CIVIL ACTION

CIV. 1a (2-44)
(Formerly D. C. Form No. 45a Rev. (6-49))

United States District Court

FOR THE

Western District of New York

RECEIVED
APR 1

CIVIL ACTION FILE NO. 75-559

Geraldine Sevor,
76 Henrietta Street
Rochester, New York 14620

Plaintiff

v.

SUMMONS

Litton Industries, Inc.
5820 Main St.
Williamsville, New York

Litton Business Systems, Inc.
5820 Main Street
Williamsville, New York

and

McBee Systems, A Subsidiary of
Litton Industries, Inc.
5820 Main Street
Williamsville, New York

Defendant

To the above named Defendant s

You are hereby summoned and required to serve upon

EMMELYN LOGAN-BALDWIN

plaintiff's attorney , whose address

510 Powers Building
Rochester, New York 14614

an answer to the complaint which is herewith served upon you, within 20 days after service of this summons upon you, exclusive of the day of service. If you fail to do so, judgment by default will be taken against you for the relief demanded in the complaint.

JOHN K. ADAMS
John K. Adams *Clerk of Court.*

Deputy Clerk.

Date: April 8, 1976

[Seal of Court]

NOTE:—This summons is issued pursuant to Rule 4 of the Federal Rules of Civil Procedure.

DEFENDANTS' AFFIDAVIT OF FRANK MASSI, sworn to 4-10-76, in Support of Motion to Dismiss.

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF NEW YORK

GERALDINE SEVOR,
76 Henrietta Street
Rochester, New York 14620

Plaintiff,

-vs-

LITTON INDUSTRIES
255 North Goodman Street
Rochester, New York 14607

and

McBEE SYSTEMS, A Subsidiary of
Litton Industries
255 North Goodman Street
Rochester, New York 14607

Defendants.

AFFIDAVIT

STATE OF CONNECTICUT)
COUNTY OF HARTFORD) SS.:

I, FRANK MASI, having been duly sworn, do depose and state as follows:

1. I am Director of Personnel Development for Royal Typewriter Company, a Division of Royal Business Machines, Inc., 150 New Park Avenue, Hartford, Connecticut 06106 (hereinafter referred to as "Royal"). This Affidavit is submitted in support of a motion on behalf of the defendants in the above matter to dismiss the complaint herein. I am familiar with the facts hereinafter stated by reason of my position as Director of Personnel Development for Royal and/or based upon personal knowledge thereof.

2. Royal is an autonomous unincorporated division of Royal Business Systems, Inc., a Nevada corporation. Royal maintains its principal place of business at the Hartford address.

3. Prior to January 31, 1976, Royal was an autonomous unincorporated division of Litton Business Systems, Inc., a

New York corporation. The operations of Royal have been maintained at various times as an unincorporated Division of Royal McBee Corporation and as a corporation, Royal Typewriter Company.

4. Royal maintains its own personnel records, books, checking accounts and payroll.

5. Royal has its own President and staff and formulates its own personnel and labor policy and is solely responsible for the recruitment and hiring of its employees and establishment and administration of wage scales and policies and benefit program, including medical benefits, vacation and sick leave.

6. Geraldine Sevor, plaintiff in the instant case, was an employee of Royal from November 6, 1964 to September 27, 1968. At no time during that period was plaintiff employed or paid by Litton Industries, Inc. See copies of her wage statements, W-2 forms (1965, 1966 and 1967), attached as part of Exhibit "A".

7. Royal is not and was not during the period of plaintiff's employment operated or controlled by Litton Business Systems, Inc. or Litton Industries, Inc. in its operations hereinabove described.

Frank Masi
FRANK MASI

Sworn to before me this
19TH day of APRIL ,
1976.

Raymond F. Morgan
Notary Public

Exhibit A – W-2 Forms (1965, 1966 and 1967) attached to Massi Affidavit.

ROYAL TYPEWRITER COMPANY, INC.
150 NEW PARK AVENUE
HARTFORD, CONNECTICUT 06106
13-251-0003

Type or print EMPLOYER'S identification number, name and address above

WAGE AND TAX STATEMENT 1965

Copy D—For employer

EMPLOYER: This copy is provided for your convenience in keeping your withholding records

INCOME TAX INFORMATION			SOCIAL SECURITY INFORMATION		STATUS	STATE TAX
FEDERAL INCOME TAX WITHHELD	WAGES PAID SUBJECT TO WITHHOLDING IN 1965	OTHER COMPENSATION PAID IN 1965	F.I.C.A. EMPLOYEE TAX WITHHELD	TOTAL F.I.C.A. WAGES PAID IN 1965	1 SINGLE 2 MARRIED	STATE INCOME TAX WITHHELD
499 10	3569 00		127 27		2	62 82

Type or print EMPLOYEE'S social security number → 066 40 2313

I 015
GERALDINE DELL
330 KAVANAUGH ROAD
HONEOYE FALLS NEW YORK

Type or print EMPLOYEE'S name and address above

NEW YORK — STATE NAME — CITY TAX WITHHELD

* EXCLUDABLE SICK PAY
† Before payroll deductions or "sick pay" exclusions

FORM W-2—U.S. Treasury Department, Internal Revenue Service

WAGE AND TAX STATEMENT 1966

Copy D - For Employer

† Includes tips reported by employee. This amount is before payroll deductions or "sick pay" exclusions.

EMPLOYER: This copy is provided for your convenience in keeping your withholding records.

ROYAL TYPEWRITER COMPANY, INC.
150 NEW PARK AVENUE
HARTFORD, CONNECTICUT 06106
13-2518003

Type or print EMPLOYER'S identification number, name, and address above

INCOME TAX INFORMATION					SOCIAL SECURITY INFORMATION		
SOCIAL SECURITY NUMBER	FEDERAL INCOME TAX WITHHELD	WAGES† PAID SUBJECT TO WITHHOLDING IN 1966	OTHER COMPENSATION PAID IN 1966	NO. OF DEPENDENTS	FICA EMPLOYEE TAX WITHHELD	TOTAL FICA WAGES PAID IN 1966	CITY TAX WITHHELD
066402313	36709	404500	1488	2	10989		

I 019
GERALDINE DELL
330 KAVANAUGH ROAD
HONEOYE FALLS NEW YORK

Type or print EMPLOYEE'S name, and address above

STATE TAX WITHHELD	TOTAL WAGES SUBJECT TO TAX IF DIFFERENT FROM FEDERAL	FOR NON-RESIDENT EMPLOYEES ENTER STATE EARNINGS
8029		

NAME OF STATE: N YORK

FOR USE OF INTERNAL REVENUE SERVICE
Employee's copy and employer's copy compared

* (SICK PAY) EXCLUDABLE UNDER SECTION 105(d)

FORM W-2 - U. S. Treasury Department, Internal Revenue Service — APP. I.R.S. 12/13/66 F107-3 (9-2-5)

STATE IDENTIFICATION NUMBER 52-11291 0 — FEDERAL IDENTIFICATION NUMBER 22-1124150

[illegible] BUSINESS SYSTEMS INC.
[illegible] BY MERGER TO-
ROYAL TYPEWRITER COMPANY INC.
150 CENTRAL AVE., ORANGE, N.J.

WAGE AND TAX STATEMENT - 1967

Copy D – For Employer

FEDERAL INCOME TAX INFORMATION			SOCIAL SECURITY INFORMATION		
FEDERAL INCOME TAX WITHHELD	WAGES† PAID SUBJECT TO WITHHOLDING IN 1967	OTHER COMPENSATION† PAID IN 1967	F.I.C.A. EMPLOYEE TAX WITHHELD	TOTAL F.I.C.A. WAGES PAID IN 1967	STATUS 1 SINGLE 2 MARRIED
372.00	4716.11	70.14	141.73		

Type or Print Employee's Social Security Number: 066-40-2313

I 019
GERALDINE DELL
330 KAVANAUGH ROAD
HONEOYE FALLS NEW YORK

Type or Print EMPLOYEE'S name and address (Include Zip Code) above.
FORM W-2—U.S. Treasury Department, Internal Revenue Service.

NAME OF STATE: NY STATE I.T. [illegible] — STATE TAX WITHHELD: 95.46

NAME OF CITY (OR STATE) — CITY TAX WITHHELD

Uncollected Employee Tax on Tips..... $

* See Circular E for "Sick pay" reporting requirements. **Leave empty for Jan. 1 adjustment.
† Includes tips reported by employee. This amount is before payroll deductions or "sick pay" exclusions. See Circular E for withholding rules. ‡ Old-age, survivors, and disability insurance. ‡‡ Includes tips reported by employee.

DEFENDANTS' AFFIDAVIT OF ALAN SNODGRASS, sworn to 4-19-76, in Support of Motion to Dismiss.

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF NEW YORK

GERALDINE SEVOR,
76 Henrietta Street
Rochester, New York 14620

Plaintiff,

-vs-

LITTON INDUSTRIES
255 North Goodman Street
Rochester, New York 14607

and

McBEE SYSTEMS, A Subsidiary of
Litton Industries
255 North Goodman Street
Rochester, New York 14607

Defendants.

AFFIDAVIT

STATE OF OHIO)
COUNTY OF) SS.:

I, ALAN SNODGRASS, having been sworn, do depose and state as follows:

1. I am the Personnel Manager of McBee Systems, a division of Kimball Systems, a Division of Litton Business Systems, Inc., Route 50-East, Athens, Ohio 45710 (hereinafter referred to as "McBee"). This Affidavit is submitted in support of a motion on behalf of the defendants in the above matter to dismiss the complaint herein. I am familiar with the facts hereinafter stated by reason of my position as Personnel Manager of McBee and/or based upon personal knowledge thereof.

2. McBee is an autonomous unincorporated division of Litton Business Systems, Inc., a New York corporation. McBee maintains its offices and principal place of business at 600 Washington Avenue, Carlstadt, New Jersey 07072. McBee maintains various offices and facilities throughout the United States.

DEFENDANTS' AFFIDAVIT OF ALAN SNODGRASS, sworn to 4-19-76, in Support of Motion to Dismiss.

3. McBee is engaged in the manufacture and sale of manual accounting and posting systems and printed forms.

4. McBee maintains its own personnel and payroll records. The personnel and payroll records of the field salaried personnel, field sales, salaried and hourly personnel at designated plant locations in the United States are maintained at the Athens, Ohio location.

5. McBee has its own General Manager and staff and formulates its own personnel and labor policy and is solely responsible for the recruitment and hiring of its employees and establishment and administration of wage scales and policies and benefit program, including medical benefits, vacation and sick leave.

6. Recruitment, selection and hiring of sales personnel of McBee is the responsibility of each District Manager of McBee, subject to guidelines established by the General Manager and staff.

7. McBee has an Affirmative Action Program for its Athens, Ohio location and a separate Affirmative Action Program for its major plant locations.

8. I have read the Complaint and the Amendment to the Complaint and the defendant's Motion to Dismiss filed herein and am familiar with the allegations contained therein. McBee is not operated or controlled by Litton Business Systems, Inc. or Litton Industries, Inc. in its operations hereinbefore described. There is no integration of operations nor formal exchange of employees or equipment with any other of the autonomous divisions of Litton Business Systems, Inc.

9. I am custodian of personnel and payroll records of the former division known as Automated Business Systems, a division of Litton Business Systems, Inc. During the years 1968 through 1973, Geraldine Sevor was employed and paid by

DEFENDANTS' AFFIDAVIT OF ALAN SNODGRASS, sworn to 4-19-76, in Support of Motion to Dismiss.

Automated Business Systems, a division of Litton Business Systems, Inc. See copies of W-2 forms (1968, 1969, 1972, 1973) attached as part of Exhibit "A."

10. The operations and practices of McBee as herein above described were in effect during October 1974 and continue to the present.

Alan Snodgrass
ALAN SNODGRASS

Sworn to before me this
19th day of april,
1976.

Josephine D. Johnson
Notary Public
JOSEPHINE D. JOHNSON, NOTARY PUBLIC
MY COMMISSION EXPIRES
JANUARY 31, 1979

Exhibit A – W-2 Forms (1968, 1969, 1972 and 1973) attached to Snodgrass Affidavit.

LITTON AUTOMATED BUSINESS SYSTEMS
A DIVISION OF LITTON BUSINESS SYSTEMS INC.
600 Washington Ave.
Carlstadt, N.J. 07072 22-1124150

INFORMATION RETURN FOR CALENDAR YEAR 1968

Employer's State identification Number

Type or print EMPLOYER'S Federal identification number, name, and address above

FEDERAL INCOME TAX INFORMATION			SOCIAL SECURITY INFORMATION		STATE OR MUNICIPAL INFORMATION	
Federal income tax withheld	Wages[1] paid subject to withholding in 1968	Other compensation[1] paid in 1968	F.I.C.A. emp wage tax withheld[2]	Total F.I.C.A. wages[2] paid in 1968	State income tax withheld	City tax withheld
470.16	3166.00	15.97	139.30 PAID		73.70	

Type or print EMPLOYEE'S social security no., name, address (including ZIP code) below

066-40-2313
GERALDINE DELL
330 KAVANAUGH RD.
HONEOYE FALLS, N.Y. 14472

No. of Dependents	Single / Married	Name of State	State Form No.
		NEW YORK	FT2102

Gross wages for State if different from Federal | ENTER STATE PAYMENTS TO NONRESIDENTS | Employee number

UNCOLLECTED EMPLOYEE TAX ON TIPS

[1] Includes tips reported by employee. This amount is before payroll deductions or withholding exemptions.

LITTON AUTOMATED BUSINESS SYSTEMS
A DIVISION OF LITTON BUSINESS INC.
600 WASHINGTON AVE.
CARLSTADT, N. J. 07072 22-1124150

WAGE AND TAX STATEMENT 1969
Copy D—For employer

Employer's State Identification Number 22-1124150

Type or print EMPLOYER'S Federal identification number, name, and address above.

FEDERAL INCOME TAX INFORMATION			SOCIAL SECURITY INFORMATION		STATE OR MUNICIPAL INFORMATION	
Federal income tax withheld	Wages paid subject to withholding in 1969[1]	Other compensation paid in 1969[2]	F.I.C.A. employee tax withheld[3]	Total F.I.C.A. wages paid in 1969[2]	State income tax withheld	City tax withheld
683.13	4274.53		205.18		103.80	

Type or print EMPLOYEE'S social security no., name, and address (including ZIP code) below.

066-40-2313

Geraldine Dell
330 Kavanaugh Road
Honeoye Falls, N.Y. 14472

100

No. of Dependents	Single	Married	Name of State	State Form No.
0		X	New York	

Name of City | City Form No. | City tax withheld

Gross wages for State if different from Federal | ENTER STATE PAYMENTS TO NONRESIDENTS

Uncollected Employee Tax on Tips

[1] Includes tips reported by employee. This amount is before payroll deductions or withholding exemptions.

FORM W-2 – U.S. Treasury Department, Internal Revenue Service APP. DLS. 12/12/68 23-1766474

Exhibit A — W-2 Forms (1968, 1969, 1972 and 1973) attached to Snodgrass Affidavit.

LITTON AUTOMATED BUSINESS SYSTEMS
A DIVISION OF LITTON BUSINESS SYSTEMS
[illegible] WASHINGTON AVENUE 22-[illegible]
CARLSTADT, NEW JERSEY 0[illegible]

INFORMATION RETURN FOR CALENDAR YEAR 1972

FOR STATE, CITY OR FILE COPY

Employer's State identification number: 23-1124130

FEDERAL INCOME TAX INFORMATION			SOCIAL SECURITY INFORMATION		STATE OR MUNICIPAL INFORMATION	
Federal income tax withheld	Wages, tips and other compensation (before payroll deductions or "take home pay" exclusions)	Other compensation not paid in cash	F.I.C.A. employee tax withheld	Total F.I.C.A. wages paid in 1972	State income tax withheld	City tax withheld
2034.00	7280.03		378.41	7280.03	254.30	

Type or print EMPLOYEE'S social security no., name, address including ZIP code

066-40-2313
Geraldine Dell
682 Phelps Rd.
Honeoye Falls, N.Y. 14472

STATUS: No. of Deps. | 1 Single 2 Married
Name of State: New York — State Form No.: 51-10083
Name of City — City Form No.
Gross wages for State if different from Federal
Enter state payments to nonresidents
Employee number
Unreflected employee tax on tips

* Includes tips reported by employee. This amount is before payroll deductions or "take home pay" exclusions.

13-2070063

INFORMATION RETURN 1973

For State, City or File Copy D

22-1124130
LITTON AUTOMATED BUSINESS SYS.
[illegible] MAPLE AVE.
PINE BROOK, N. J. 0[illegible]

Type or print EMPLOYER'S federal identifying number, name, address and ZIP code above

Employer's State id. ...lying number: 22-1124130 [illegible]

FEDERAL INCOME TAX INFORMATION		SOCIAL SECURITY INFORMATION			STATE OR LOCAL INCOME TAX INFORMATION				
1 Federal income tax withheld	2 Wages, tips and other compensation	3 F.I.C.A. tax withheld	4 Total F.I.C.A. wages	6 State income tax withheld	7 State wages paid	8 Name of State	5 [illegible]	9 City income tax withheld	10 City wages paid	11 Name of City
$796.39	5,577.24	$334.33	5,577.24	$204.00	5,577.24					

EMPLOYEE'S social security number: 066-40-2313

Geraldine Dell
682 Phelps Road
Honeoye Falls, N. Y. 14472

Type or print EMPLOYEE'S name, address and ZIP code above.

An "X" in the upper left corner indicates this is a corrected form.

STATUS | OTHER INFORMATION (SEE CIRCULAR E) | State tax number | City tax number
1 Single 2 Married | Cost of group term life insurance included in box 5 | Exclusions with pay included in box 5
25

UNDATED SUMMONS received 4-27-76, Served with Complaint (same as Complaint dated 12-29-76 and Amended Complaint dated 3-18-76), with Notice to Produce (same as Notice to Produce dated 12-29-76), and with Amended Complaint (same as Amended Complaint dated 3-18-76).

RE[illegible]

4-27-[illegible]

SUMMONS IN A CIVIL ACTION

CIV. 1 (2-64)
(Formerly D. C. Form No. 45 Rev. (6-49))

United States District Court

FOR THE

WESTERN DISTRICT OF NEW YORK

CIVIL ACTION FILE NO. 75-559

Geraldine Sevor,
76 Henrietta Street
Rochester, New York 14620

Plaintiff

v.

Litton Industries, Inc.
5820 Main Street
Williamsville, New York

Litton Automated Business Systems, Inc.
5820 Main Street
Williamsville, New York

and

McBee Systems, a subsidiary of Litton Industries
5820 Main Street
Williamsville, New York

Defendants

SUMMONS

To the above named Defendant :

You are hereby summoned and required to serve upon EMMELYN LOGAN-BALDWIN

plaintiff's attorney, whose address 510 Powers Building
Rochester, New York 14614

an answer to the complaint which is herewith served upon you, within 20 days after service of this summons upon you, exclusive of the day of service. If you fail to do so, judgment by default will be taken against you for the relief demanded in the complaint.

Clerk of Court.

Deputy Clerk.

Date:

[Seal of Court]

NOTE:—This summons is issued pursuant to Rule 4 of the Federal Rules of Civil Procedure.

DEFENDANTS' NOTICE OF MOTION WITH MOTION TO DISMISS, dated 4-30-76, and Supporting Affidavit of Anthony R. Palermo, Esq., sworn to 4-30-76 with Exhibits attached.

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF NEW YORK

GERALDINE SEVOR,

Plaintiff,

-vs-

Civ. No. 75-559

LITTON INDUSTRI[illegible] McBEE SYSTEMS, A Subsidiary o[illegible] Industries,

Defendants.

(Original Summons Caption)

GERALDINE SEVOR,

Plaintiff,

-vs-

NOTICE OF MOTION

LITTON INDUSTRIES, INC., LITTON BUSINESS SYSTEMS, INC., and McBEE SYSTEMS, A Subsidiary of Litton Industries, Inc.,

Defendants.

(First Amended Summons Caption)

GERALDINE SEVOR,

Plaintiff,

-vs-

LITTON INDUSTRIES, INC., LITTON AUTOMATED BUSINESS SYSTEMS, INC., and McBEE SYSTEMS, A Subsidiary of Litton Industries,

Defendants.

(Second Amended Summons Caption)

SIRS:

PLEASE TAKE NOTICE that the undersigned, on behalf of Litton Industries, Inc., Litton Business Systems, Inc., and

DEFENDANTS' NOTICE OF MOTION WITH MOTION TO DISMISS, dated 4-30-76, and Supporting Affidavit of Anthony R. Palermo, Esq., sworn to 4-30-76 with Exhibits attached.

McBee Systems, will bring the annexed motion pursuant to Rule 12 of the Federal Rules of Civil Procedure and/or Rule 56 of the Federal Rules of Civil Procedure, before this Court at the United States Courthouse in Rochester, New York on the 24th day of May, 1976 at 10 o'clock in the forenoon of that day or as soon thereafter as counsel can be heard.

Dated: April 30, 1976

JEANETTE M. THOMAS, ESQ.
360 North Crescent Drive
Beverly Hills, California 90210

and

BRENNAN, CENTNER, PALERMO & BLAUVELT

By: Anthony R. Palermo
Anthony R. Palermo, Esq.
A Member of the Firm

Attorneys for Defendants
Office and Post Office Address
500 Reynolds Arcade Building
Rochester, New York 14614

TO: EMMELYN LOGAN-BALDWIN, ESQ.
Attorney for Plaintiff
Office and Post Office Address
510 Powers Building
Rochester, New York 14614

DEFENDANTS' NOTICE OF MOTION WITH MOTION TO DISMISS, dated 4-30-76, and Supporting Affidavit of Anthony R. Palermo, Esq., sworn to 4-30-76 with Exhibits attached.

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF NEW YORK

GERALDINE SEVOR,

Plaintiff,

-vs- Civ. No. 75-559

LITTON INDUSTRIES and McBEE SYSTEMS, A Subsidiary of Litton Industries,

Defendants.

(Original Summons Caption)

GERALDINE SEVOR,

Plaintiff,

-vs- MOTION TO DISMISS

LITTON INDUSTRIES, INC., LITTON BUSINESS SYSTEMS, INC., and McBEE SYSTEMS, A Subsidiary of Litton Industries, Inc.,

Defendants.

(First Amended Summons Caption)

GERALDINE SEVOR,

Plaintiff,

-vs-

LITTON INDUSTRIES, INC., LITTON AUTOMATED BUSINESS SYSTEMS, INC., and McBEE SYSTEMS, A Subsidiary of Litton Industries,

Defendants.

(Second Amended Summons Caption)

The defendants named in the first amended summons, dated April 8, 1976, to wit, Litton Industries, Inc., Litton Business Systems, Inc., and McBee Systems, A Division of Kimball

DEFENDANTS' NOTICE OF MOTION WITH MOTION TO DISMISS, dated 4-30-76, and Supporting Affidavit of Anthony R. Palermo, Esq., sworn to 4-30-76 with Exhibits attached.

Systems which is a Division of Litton Business Systems, Inc., incorrectly designated in said summons as "A Subsidiary of Litton Industries, Inc.", and the defendants named in the second amended undated summons, to wit, Litton Industries, Inc., Litton Automated Business Systems, a former Division of Litton Business Systems, Inc. and incorrectly designated "Litton Automated Business Systems, Inc.", and McBee Systems, a Division of Kimball Systems which is a Division of Litton Business Systems, Inc., incorrectly designated in said summons as "A Subsidiary of Litton Industries", move this Court as follows:

1. To dismiss the first and second causes of action of plaintiff's amended complaint because they fail to state a claim against said defendants upon which relief can be granted.

2. To dismiss the first cause of action of plaintiff's amended complaint for lack of jurisdiction with respect to all allegations under Title VII of the Civil Rights Act of 1964, other than possibly failure to hire, because plaintiff failed to file with the Equal Employment Opportunity Commission within the statutory time required.

3. To dismiss the second cause of action of plaintiff's amended complaint for lack of jurisdiction because the asserted cause of action appears on the face of said amended complaint not to have been commenced within a period of two years from the time when the alleged claim accrued and is thus barred by 29 U.S.C. §255(a) and no facts are alleged to support application of a longer statute of limitation, or, in the alternative, to compel plaintiff to furnish a more definite statement of the nature of

her claims in said second cause of action because the allegations are so vague and ambiguous that defendants should not reasonably be required to prepare a responsive pleading unless said defendants are informed more definitely as to the essential factual matters, including but not limited to (1) the time when and the places where the alleged unlawful acts are alleged to have been performed; and (2) the names of individuals involved; and (3) the manner and respects in which said defendants allegedly deprived the plaintiff of equal employment benefit and wages referred to; and (4) the facts upon which plaintiff will rely to support any claimed willful violation.

4. To dismiss the first and second causes of action of said amended complaint, insofar as they seek to obtain relief on behalf of a class because:

a. The amended complaint fails to state the necessary allegations required to proceed as a class action under Rule 23, and

b. Plaintiff has failed to obtain written consent of any employee member of the class and file the same with the Court pursuant to applicable provisions of law.

5. To set aside purported service upon Litton Industries, Inc. and to dismiss the amended complaint against Litton Industries, Inc. for lack of jurisdiction over the person of said Litton Industries, Inc.

6. To grant a protective order with respect to the plaintiff's First Notice to Produce documents, vacating said notice, or in the alternative, deferring response to said notice

pending determination of the motions addressed to service of the pleadings and the sufficiency of the pleadings, or in the alternative, to limit discovery of the records sought to only that entity which was plaintiff's actual employer at times relevant to any pleadings which may be permitted.

7. And for such other and further relief as the Court may deem just and proper.

Dated: April 30, 1976

JEANETTE M. THOMAS, ESQ.
360 North Crescent Drive
Beverly Hills, California 90210

and

BRENNAN, CENTNER, PALERMO & BLAUVELT

By: Anthony R. Palermo
Anthony R. Palermo, Esq.
A Member of the Firm

Attorneys for Defendants
Office and Post Office Address
500 Reynolds Arcade Building
Rochester, New York 14614

TO: EMMELYN LOGAN-BALDWIN, ESQ.
Attorney for Plaintiff
Office and Post Office Address
510 Powers Building
Rochester, New York 14614

DEFENDANTS' NOTICE OF MOTION WITH MOTION TO DISMISS, dated 4-30-76, and Supporting Affidavit of Anthony R. Palermo, Esq., sworn to 4-30-76 with Exhibits attached.

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF NEW YORK

GERALDINE SEVOR,

Plaintiff,

-vs-

Civ. No. 75-559

LITTON INDUSTRIES and McBEE SYSTEMS, A Subsidiary of Litton Industries,

Defendants.

(Original Summons Caption)

GERALDINE SEVOR,

Plaintiff,

-vs-

AFFIDAVIT

LITTON INDUSTRIES, INC., LITTON BUSINESS SYSTEMS, INC., and McBEE SYSTEMS, A Subsidiary of Litton Industries, Inc.,

Defendants.

(First Amended Summons Caption)

GERALDINE SEVOR,

Plaintiff,

-vs-

LITTON INDUSTRIES, INC., LITTON AUTOMATED BUSINESS SYSTEMS, INC., and McBEE SYSTEMS, A Subsidiary of Litton Industries,

Defendants.

(Second Amended Summons Caption)

STATE OF NEW YORK)
COUNTY OF MONROE) ss:

ANTHONY R. PALERMO, being duly sworn, deposes and says:

DEFENDANTS' NOTICE OF MOTION WITH MOTION TO DISMISS, dated 4-30-76, and Supporting Affidavit of Anthony R. Palermo, Esq., sworn to 4-30-76 with Exhibits attached.

1. I am an attorney admitted to practice in the State of New York and in this Court, and a member of the firm of Brennan, Centner, Palermo & Blauvelt, attorneys requested to represent the defendants in the above-entitled matter. This affidavit is submitted in support of a motion to dismiss the amended complaint herein and for other relief.

2. On February 10, 1976, your deponent caused a notice of motion and a motion to dismiss the action commenced with the original summons, supported by an affidavit of the same date. Subsequently thereto, your deponent caused to be served in support of said motion and in opposition to a motion to compel production of records, the following affidavits: Robert H. Lentz, sworn to February 23, 1976, David Miller, sworn to March 25, 1976, Dan Johnson, sworn to March 31, 1976, Anthony R. Palermo, sworn to April 7, 1976, Alan Snodgrass, sworn to April 19, 1976, and Frank Masi, sworn to April 19, 1976. Said affidavits are incorporated herein by reference, and it is respectfully requested that all of said affidavits be considered as part of and in support of the instant application.

3. Upon information and belief, on or about April 12, 1976, copies of the first amended summons, dated April 8, 1976, together with a copy of the original complaint, dated December 29, 1975, and a copy of the amended complaint, dated March 18, 1976, were personally delivered to Sue Campbell at her office located at 5820 Main Street, Williamsville, New York. A copy of the April 8, 1976 summons is attached as Exhibit A. Also delivered at that time was a copy of a First Notice to Produce, dated

December 29, 1975. A comparison of the complaint dated December 29, 1975 and the First Notice to Produce indicates these documents are the same as the documents served on or about January 5, 1976 upon David Miller, then a sales representative of McBee Systems in Rochester, New York.

4. Upon information and belief, on or about April 26, 1976, copies of the second amended summons, which is undated, were served upon Dan Johnson at his office at 5820 Main Street, Williamsville, New York, together with a copy of the original complaint, dated December 29, 1975, and a copy of an amended complaint, dated March 18, 1976. A copy of the undated second amended summons is attached as Exhibit B. Also delivered at that time was a copy of a First Notice to Produce, dated December 29, 1975. A comparison of the complaint dated December 29, 1975 and the First Notice to Produce indicates these documents are the same as the documents served on or about January 5, 1976 upon David Miller, then a sales representative of McBee Systems in Rochester, New York.

5. The original motion to dismiss of defendants was argued before the Court on April 12, 1976, and briefs in support of and in opposition to said motion were submitted to the Court on April 26, 1976. It is respectfully requested that the Court consider all original and reply briefs submitted in connection with the prior motion as submitted in support of the instant motion.

6. With respect to the First Notice to Produce served on April 12, 1976 and again on April 26, 1976, it is respectfully

submitted that said notices are untimely, inasmuch as said notices call for production of records on February 18 and 19, 1976, dates which precede the date of service of said notices and, accordingly, said notices should be deemed a nullity and vacated. In addition, your deponent believes said notices are premature and, in the interest of justice, said notices should be vacated, or in the alternative, consideration of the notices should be deferred pending decision on the instant motions addressed to service and sufficiency of the pleadings. Your deponent incorporates herein by reference defendants' responses and objections to plaintiff's First Notice to Produce, dated March 4, 1976. It is respectfully submitted that discovery should be allowed, if at all, only with respect to the entity which was the actual employer of plaintiff at times relevant to any pleadings the Court may allow.

7. Upon information and belief, Sue Campbell is the secretary of Dan Johnson, the District Manager of McBee Systems in Buffalo, New York. Upon information and belief, she is not an employee of Litton Industries, Inc. nor is she a managing agent or authorized agent to accept service of process on behalf of Litton Industries, Inc. or McBee Systems or Litton Business Systems, Inc.

WHEREFORE, your deponent respectfully requests the Court to declare the purported service upon Litton Industries, Inc. null and void and to dismiss the complaint as to Litton Industries, Inc. and to grant the relief requested in the attached notice of motion and, further, to grant a protective

order vacating the notice to produce or declaring it a nullity or granting further protective relief limiting or conditioning discovery or deferring consideration of the same until final determination of the instant motions, and for such other and further relief as the Court may deem just and proper.

Anthony R. Palermo

Anthony R. Palermo

Sworn to before me this 30th
day of April, 1976.

Nancy Ellen Scott

Notary Public

NANCY ELLEN SCOTT
Notary Public, State of New York
[illegible] COUNTY, N. Y.
Commission Expires March 30, 1977

DEFENDANTS' NOTICE OF MOTION WITH MOTION TO DISMISS, dated 4-30-76, and Supporting Affidavit of Anthony R. Palermo, Esq., sworn to 4-30-76 with Exhibits attached.

SUMMONS IN A CIVIL ACTION (Formerly D. C. Form No. 40a Rev. 7-53)

United States District Court

FOR THE

Western District of New York

75-559

CIVIL ACTION FILE NO.

Geraldine Sevor,
76 Henrietta Street
Rochester, New York 14620

Plaintiff

v.

Litton Industries, Inc.
5820 Main St.
Williamsville, New York

Litton Business Systems, Inc.
5820 Main Street
Williamsville, New York

and

McBee Systems, A Subsidiary of
Litton Industries, Inc.
5820 Main Street
Williamsville, New York

Defendant

SUMMONS

To the above named Defendant s

You are hereby summoned and required to serve upon

EMMELYN LOGAN-BALDWIN

plaintiff's attorney , whose address

510 Powers Building
Rochester, New York 14614

an answer to the complaint which is herewith served upon you, within 20 days after service of this summons upon you, exclusive of the day of service. If you fail to do so, judgment by default will be taken against you for the relief demanded in the complaint.

JOHN K. ADAMS
John K. Adams *Clerk of Court.*

Deputy Clerk.

Date: April 5, 1976

[Seal of Court]

NOTE:—This summons is issued pursuant to Rule 4 of the Federal Rules of Civil Procedure.

EXHIBIT A

DEFENDANTS' NOTICE OF MOTION WITH MOTION TO DISMISS, dated 4-30-76, and Supporting Affidavit of Anthony R. Palermo, Esq., sworn to 4-30-76 with Exhibits attached.

SUMMONS IN A CIVIL ACTION

United States District Court

FOR THE

WESTERN DISTRICT OF NEW YORK

CIVIL ACTION FILE NO. 75-559

Geraldine Sevor,
76 Henrietta Street
Rochester, New York 14620

Plaintiff

v.

Litton Industries, Inc.
5820 Main Street
Williamsville, New York

Litton Automated Business Systems, Inc.
5820 Main Street
Williamsville, New York

and

McBee Systems, a subsidiary of Litton Industries
5820 Main Street
Williamsville, New York

Defendants

SUMMONS

To the above named Defendant :

You are hereby summoned and required to serve upon EMMELYN LOGAN-BALDWIN

plaintiff's attorney , whose address 510 Powers Building
Rochester, New York 14614

an answer to the complaint which is herewith served upon you, within 20 days after service of this summons upon you, exclusive of the day of service. If you fail to do so, judgment by default will be taken against you for the relief demanded in the complaint.

Clerk of Court.

Deputy Clerk.

Date:

[Seal of Court]

NOTE:—This summons is issued pursuant to Rule 4 of the Federal Rules of Civil Procedure.

EXHIBIT B

DEFENDANTS' NOTICE OF MOTION WITH MOTION TO DISMISS, dated 4-30-76, and Supporting Affidavit of Anthony R. Palermo, Esq., sworn to 4-30-76 with Exhibits attached.

AFFIDAVIT OF SERVICE

STATE OF NEW YORK)
COUNTY OF MONROE) ss:

SUSAN SPAULDING, being duly sworn, deposes and says: deponent is not a party to this action, is over 18 years of age, and resides at Rochester, New York.

On April 30, 1976, at approximately 2:15 p.m., deponent served the within Notice of Motion, Motion to Dismiss and Affidavit, all dated April 30, 1976, upon Emmelyn Logan-Baldwin, Esq., attorney for plaintiff in this action, by delivering a true copy thereof to Josephine Brubeck, Esq., an attorney associated with Emmelyn Logan-Baldwin, Esq., at 510 Powers Building, Rochester, New York.

Susan Spaulding
Susan Spaulding

Sworn to before me this
30th day of April, 1976.

Anthony R. Palermo
Notary Public

PLAINTIFF'S SUPPLEMENTAL AFFIRMATION OF EMMELYN LOGAN-BALDWIN, ESQ., dated 5-11-76, in Support of Cross-Motion to Compel Discovery and in Opposition to Motion to Dismiss with Appendix attached.

UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF NEW YORK

GERALDINE SEVOR, Plaintiff, -vs- LITTON INDUSTRIES, INC., LITTON BUSINESS SYSTEMS, INC., and MCBEE SYSTEMS, a subsidiary of LITTON INDUSTRIES, INC. Defendants.	SUPPLEMENTAL AFFIRMATION IN SUPPORT OF CROSS-MOTION TO COMPEL DISCOVERY AND IN OPPOSITION TO DEFENDANTS' MOTION TO DISMISS

Emmelyn Logan-Baldwin, under penalties of perjury, affirms the following:

1. I am an attorney at law duly licensed to practice my profession in the State of New York. I am the attorney for the plaintiff in this action. I am familiar with the pleadings and proceedings herein. This affirmation is submitted in further support of plaintiff's cross-motion to compel discovery and in opposition to defendants' motion to dismiss.

2. In plaintiff's previous papers, she submitted a copy of the Litton Industries, Inc. Annual Report. Litton Industries, Inc. therein represents that it is present in New York and doing business in New York through its various divisions and/or wholly owned subsidiaries, including, for example, McBee Systems and Litton Business, Inc. Further evidence of this is found by the fact that in response to letters sent by my office requesting the annual report for 1975,

of each of the following companies, Litton Automated Business Systems Division, Litton Business Systems, Inc., Litton Industries, Inc. and Sweda International, my office received back the same annual report--the annual report for Litton Industries, Inc. (See Appendix A).

3. Although plaintiff maintains the position that service on David Miller was sufficient service for Litton Industries, Inc. additional service was made on Dan Johnson who represents himself to the court as a person authorized to receive process on behalf of all defendants. In Mr. Johnson's absence, Ms. Sue Campbell, secretary to Mr. Dan Johnson, and who held herself out as the person in charge of the office and authorized to receive process accepted service on April 12, 1976. Service was made by Deputy U.S. Marshall Paul G. Anderson. However, in light of prior experience in this case with the defendants denying authority subsequent to acceptance of service from the U.S. Marshall, I caused additional service on Dan Johnson of the summons, complaint, notice to produce and amended complaint on April 26, 1976 by Deputy U.S. Marshall Joseph Hoffarth.

4. While defendants assert for the first time in their most recently served affidavits that employment policies of McBee Systems and Royal Typewriter Company are independent of the control of Litton Industries, Inc., documentary evidence in the form of Litton Industries, Inc. Annual Report for 1975 refutes this assertion. As previously noted, Litton Industries,

PLAINTIFF'S SUPPLEMENTAL AFFIRMATION OF EMMELYN LOGAN-BALDWIN, ESQ., dated 5-11-76, in Support of Cross-Motion to Compel Discovery and in Opposition to Motion to Dismiss with Appendix attached.

Inc. holds itself out to the public as being one corporation with an integrated work force-all of the persons working in its various divisions, subsidiaries being employees of Litton Industries, Inc. and fully under the control of Litton Industries, Inc. Without exception, when my office has inquired of any of the various Litton divisions or subsidiaries about information the reply of the subsidiaries and divisions has been to send the Litton Industries, Inc. Annual Report for 1975.

Moreoever, we know that employment policies of McBee Systems or Royal Typewriter Company are not separate from Litton Industries. Plaintiff Sevor participated in the employee benefit of a Litton Industries Employees Stock Purchase Plan. This obviously was not a separate or an independent benefit program of McBee Systems or Royal Typewriter Company.

Emmelyn Logan-Baldwin

May 11, 1976

PLAINTIFF'S SUPPLEMENTAL AFFIRMATION OF EMMELYN LOGAN-BALDWIN, ESQ., dated 5-11-76, in Support of Cross-Motion to Compel Discovery and in Opposition to Motion to Dismiss with Appendix attached.

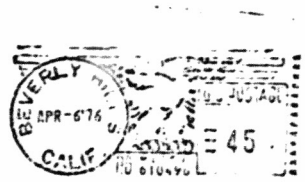
CERTIFICATE OF SERVICE

I hereby certify that the foregoing Supplemental Affirmation in Support of Cross-Motion to Compel Discovery and in Opposition to Defendants' Motion to Dismiss was served on the defendants by my causing a copy thereof to be mailed to attorneys for defendants, Brennan, Centner, Palermo & Blauvelt, Anthony R. Palermo, Esq., of Counsel, 500 Reynolds Arcade Building, Rochester, New York, this 11th day of May 1976.

Emmelyn Logan-Baldwin
Attorney for Plaintiff
Office and P.O. Address:
510 Powers Building
Rochester, New York 14614

May 11, 1976

360 N. Crescent Dr., Beverly Hills, California 90210



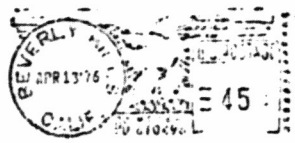
Third Class Mail

Ms. Josephine Trubek
Emmelyn Logan-Baldwin
Attorney and Counselor at Law
510 Powers Building
Rochester, New York 14614

Litton Industries
1975 Annual Report

PLAINTIFF'S SUPPLEMENTAL AFFIRMATION OF EMMELYN LOGAN-BALDWIN, ESQ., dated 5-11-76, in Support of Cross-Motion to Compel Discovery and in Opposition to Motion to Dismiss with Appendix attached.

360 N. Crescent Dr., Beverly Hills, California 90210





360 North Crescent Drive, Beverly Hills, California 90210

Third Class Mail

Josephone Trubek
Emmelyn Logan-Baldwin
510 Powers Building
Rochester, NY 14614

Litton Industries
1975 Annual Report

PLAINTIFF'S SUPPLEMENTAL AFFIRMATION OF EMMELYN LOGAN-BALDWIN, ESQ., dated 5-11-76, in Support of Cross-Motion to Compel Discovery and in Opposition to Motion to Dismiss with Appendix attached.

PLAINTIFF'S SUPPLEMENTAL AFFIRMATION OF EMMELYN LOGAN-BALDWIN, ESQ., dated 5-11-76, in Support of Cross-Motion to Compel Discovery and in Opposition to Motion to Dismiss with Appendix attached.

Litton SWEDA INTERNATIONAL

34 Maple Avenue, Pine Brook, New Jersey 07058 201 575-8[illegible]

Richard T. Cameron, Vice President-Industrial Relations

April 7, 1976

Ms. Josephine Trubek
Emmelyn Logan-Baldwin
Attorney and Counselor at Law
510 Powers Building
Rochester, New York 14614

Dear Ms. Trubek:

As per your written request of April 1, 1976, please find enclosed a copy of our 1975 annual report

Regards.

Sincerely,

Kathleen L. Kennedy

Kathleen L. [illegible]nnedy
Industrial Relations

/klk
Encl.

PLAINTIFF'S SUPPLEMENTAL AFFIRMATION OF EMMELYN LOGAN-BALDWIN, ESQ., dated 5-11-76, in Support of Cross-Motion to Compel Discovery and in Opposition to Motion to Dismiss with Appendix attached.

EMMELYN LOGAN-BALDWIN
ATTORNEY AND COUNSELOR AT LAW
510 POWERS BUILDING
ROCHESTER, NEW YORK 14614
716-232-2292

April 1, 1976

Litton Automated Business Systems
Division
Litton Industries, Inc.
51 Penn Street
Fall River, Massachusetts 02724

To Whom It May Concern:

Please send me one copy of your 1975 annual report. Thank you very much for your assistance.

Very truly yours,

Josephine Trubek

Josephine Trubek

JT:mm

Ms. Trubek,
I already forwarded you a copy of our annual 1975 report on 4-7-76

RECEIVED
Kathy Kennedy
Personnel FALL RIVER
Pawtucket, RI

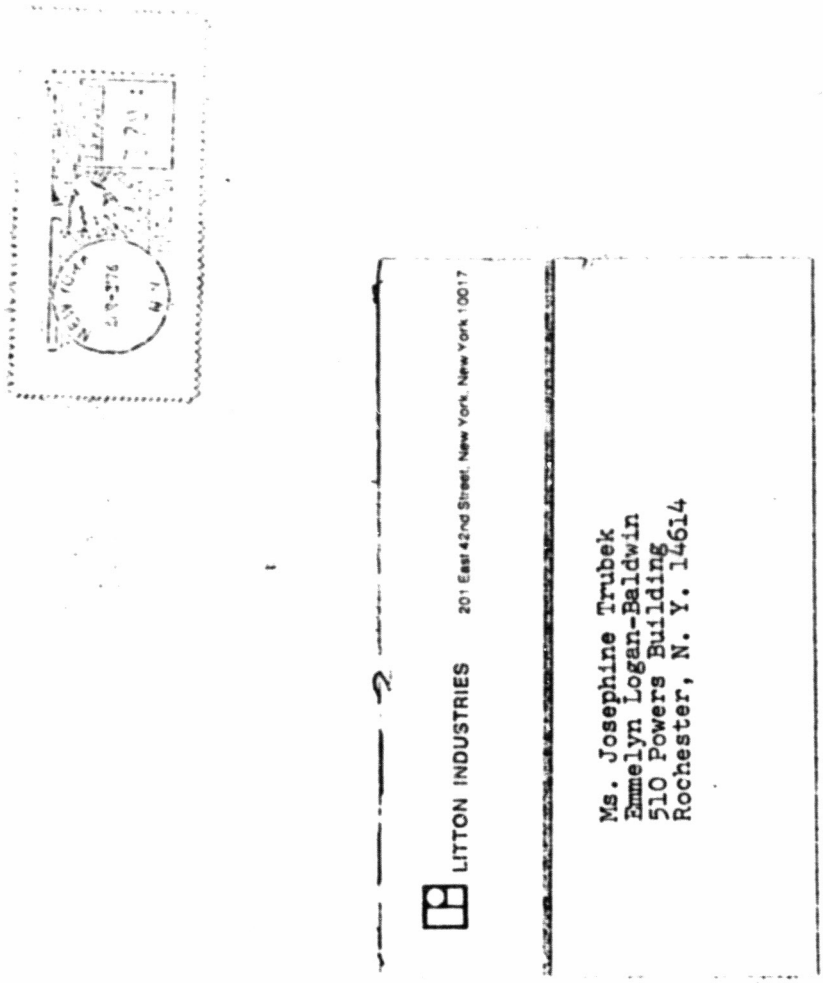
Litton **SWEDA INTERNATIONAL**
34 Maple Avenue, Pine Brook, N. J. 07058

Ms. Josephine Trubek
Emmelyn Logan-Baldwin
Attorney and Counselor at Law
510 Powers Building
Rochester, New York 14614

PLAINTIFF'S SUPPLEMENTAL AFFIRMATION OF EMMELYN LOGAN-BALDWIN, ESQ., dated 5-11-76, in Support of Cross-Motion to Compel Discovery and in Opposition to Motion to Dismiss with Appendix attached.

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PLAINTIFF'S SUPPLEMENTAL AFFIRMATION OF EMMELYN LOGAN-BALDWIN, ESQ., dated 5-11-76, in Support of Cross-Motion to Compel Discovery and in Opposition to Motion to Dismiss with Appendix attached.



PLAINTIFF'S CROSS-MOTION, dated 5-21-76, to Compel Discovery and in Opposition to Motion to Dismiss and Supporting Affirmation of Emmelyn Logan-Baldwin.

UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF NEW YORK

GERALDINE SEVOR, Plaintiff, -vs- LITTON INDUSTRIES, INC., LITTON BUSINESS SYSTEMS, INC. and MCBEE SYSTEMS, a subsidiary of LITTON INDUSTRIES, INC. Defendants.	NOTICE OF CROSS-MOTION TO COMPEL DISCOVERY; OPPOSITION TO DEFENDANTS' MOTION TO DISMISS

PLEASE TAKE NOTICE that upon plaintiff's complaint, plaintiff's amended complaint, Notice to Produce, plaintiff's Notice of Cross-Motion to Compel Discovery; Opposition to Defendants' Motion to Dismiss dated March 18, 1976 and all of plaintiff's supplemental papers in connection with that motion, the affirmation of Emmelyn Logan-Baldwin dated May 21, 1976 and upon all the papers and proceedings heretofore had herein, plaintiff will move at a Motion Term of this court on May 24, 1976 at the Federal Building, State Street, Rochester, New York at 10:00 a.m. or as soon thereafter as counsel can be heard for an order compelling the defendants to produce documents pursuant to a Notice to Produce duly served herein. Plaintiff will request such other and further

PLAINTIFF'S CROSS-MOTION, dated 5-21-76, to Compel Discovery and in Opposition to Motion to Dismiss and Supporting Affirmation of Emmelyn Logan-Baldwin.

relief as to the court may seem just and proper.

PLEASE TAKE FURTHER NOTICE that upon the same papers and at the same time and place, plaintiff will oppose defendants' motion dated April 30, 1976.

Emmelyn Logan-Baldwin
Attorney for Plaintiff
Office and P.O. Address:
510 Powers Building
Rochester, New York 14614
Telephone: 716-232-2292

May 21, 1976.

PLAINTIFF'S CROSS-MOTION, dated 5-21-76, to Compel Discovery and in Opposition to Motion to Dismiss and Supporting Affirmation of Emmelyn Logan-Baldwin.

UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF NEW YORK

GERALDINE SEVOR, Plaintiff, -vs- LITTON INDUSTRIES, INC., LITTON BUSINESS SYSTEMS, INC. and MCBEE SYSTEMS, a subsidiary of LITTON INDUSTRIES, INC. Defendants.	AFFIRMATION IN SUPPORT OF CROSS-MOTION TO COMPEL DISCOVERY; OPPOSITION TO DEFENDANTS' MOTION TO DISMISS

Emmelyn Logan-Baldwin, under penalties of perjury, affirms the following

1. I am an attorney at law duly licensed to practice my profession in the State of New York. I am the attorney for the plaintiff in this action. I am familiar with the pleadings and proceedings herein. This affirmation is submitted in support of plaintiff's cross-motion to compel discovery and in opposition to defendants' motion to dismiss.

2. In response to defendants' original motion to dismiss herein, plaintiff served Notice of Cross-Motion to Compel Discovery; Opposition to Defendants' Motion to Dismiss, dated March 18, 1976, Supplemental Affirmation of Emmelyn Logan-Baldwin, dated April 9, 1976 with attached affidavit of James A. Livingston, dated April 9, 1976, and Supplemental Affirmation of Emmelyn Logan-Baldwin, dated May 11, 1976. Plaintiff has submitted a Brief in Support of Cross-Motion to

Compel Discovery and in Opposition to Defendants' Motion to Dismiss on April 26, 1976, and a Reply Brief in Support of Cross-Motion to Compel Discovery and in Opposition to Defendants' Motion to Dismiss on May 11, 1976. Plaintiff requests that all these papers be considered in support of this motion to compel discovery and this opposition to defendants' latest motion to dismiss.

3. This motion should be granted because all defendants have been properly served with process, plaintiff states claims of employment discrimination pursuant to Title VII of the Civil Rights Act of 1964 and the Equal Pay Act. All of the documents which plaintiff requests in the Notice to Produce are relevant as a matter of law and must be produced. There should be no further delay in the production of those documents.

4. In some of the previous papers served by the defendants, they have questioned service of process on various of the defendants. Apparently, now the defendants admit that process has been duly served on Dan Johnson and contest only that such service is not sufficient service for Litton Industries, Inc. (A typographical error was made in the caption on the summons served on Dan Johnson. The parties by stipulation submitted herewith have agreed to correct the caption of that summons.)

5. For the reasons detailed in the previous papers and, in summary, service on Litton Industries, Inc. by making

PLAINTIFF'S CROSS-MOTION, dated 5-21-76, to Compel ' ery and in Opposition to Motion to Dismiss and Supporting Affirmation o. . melyn Logan-Baldwin.

service on David Miller who held himself out to the United States Marshall as the "branch manager" of Litton Industries, on Dan Johnson who represents himself to the court in his affidavit of March 31. 1976 as the district manager of McBee Systems, a division of Kimball Systems, a division of Litton Business Systems, Inc., a wholly owned subsidiary of Litton Industries, Inc., and on Sue Campbell are each effective services on Litton Industries, Inc. (Mr. Johnson further represents in his affidavit to the court of March 31, 1976 that the Rochester office of McBee Systems is within his district and is under his supervision.)

6. As noted in the previous papers, plaintiff's complaints pursuant to Title VII have been timely filed both with the New York State Division of Human Rights and the Equal Employment Opportunity Commission, as required by Title VII. All elements of plaintiff's Equal Pay claim have been alleged. In contrast to what defendants suggest plaintiff has alleged willful violation of the Equal Pay Act. Plaintiff alleges that the defendants knew or should have known of their obligations under the Equal Pay Act; the defendants have engaged in a course of conduct to intimidate witnesses since plaintiff has complained of discrimination; notwithstanding plaintiff's complaints of discrimination, the employment discrimination continues to date.

7. In no sense has the service of plaintiff's Notice to Produce been untimely. Defendants have had the notice to

produce since on or about January 5, 1976 when it was served by the United States Marshall. Defendants have simply delayed any production pending hearing on their motions to dismiss. If defendants are indeed ready to produce documents as they should be under the circumstances, I will accommodate as much as possible their suggestion of a date in the near future when the documents will be produced.

8. For these reasons, I respectfully request that plaintiff's motion to compel discovery be granted and the defendants' motion to dismiss be denied.

Emmelyn Logan-Baldwin

May 21, 1976

PLAINTIFF'S CROSS-MOTION, dated 5-21-76, to Compel Discovery and in Opposition to Motion to Dismiss and Supporting Affirmation of Emmelyn Logan-Baldwin.

CERTIFICATE OF SERVICE

I hereby certify that I have served the foregoing Cross-Motion to Compel Discovery; Opposition to Defendants' Motion to Dismiss and Affirmation in Support of Cross-Motion to Compel Discovery; Opposition to Defendants' Motion to Dismiss on the defendants by my causing a copy thereof to be delivered to the office of attorneys for defendants, Brennan, Centner, Palermo & Blauvelt, 500 Reynolds Arcade Building, Rochester, New York, this 21st day of May, 1976.

Emmelyn Logan-Baldwin
Attorney for Plaintiff
Office and P.O. Address:
510 Powers Building
Rochester, New York 14614
Telephone: 716-232-2292

May 21, 1976

DECISION AND ORDER APPEALED FROM, dated 6-29-76.

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF NEW YORK

GERALDINE SEVOR,

Plaintiff

- vs - CIVIL 75-559

LITTON INDUSTRIES, INC., LITTON AUTOMATED BUSINESS SYSTEMS, INC., and McBEE SYSTEMS, A Subsidiary of Litton Industries,

Defendants

Emmelyn Logan-Baldwin
510 Powers Building
Rochester, N.Y. 14614
Attorney for plaintiff

Brennan, Centiner, Palermo & Blauvelt
500 Reynolds Arcade Building
Rochester, N.Y. 14614
Attorneys for defendants

The original complaint naming Litton Industries and McBee Systems, a Subsidiary of Litton Industries, as defendants, was filed December 30, 1974. There followed a first amended complaint and a second amended complaint. The second amended complaint named as defendants, Litton Industries, Inc., Litton Automated Business Systems, Inc., and McBee Systems, A Subsidiary of Litton Industries.

By motion with supporting papers, filed May 3, 1976, Litton Industries Inc., Litton Automated Business

Systems, Inc., and McBee Systems, moved to dismiss the second amended complaint on grounds separately numbered in the motion and for a protective order with respect to plaintiff's first notice to produce documents, to vacate the notice, or in the alternative, to defer response to the notice pending determination of the motions addressed to service of the pleadings and the sufficiency of the pleadings, or in the alternative, to limit discovery of records sought to that entity which was plaintiff's actual employer at times relevant to any pleadings which may be permitted.

The defendants had previously moved to dismiss and for a protective order on February 10, 1976. The plaintiff on March 22, 1976 by notice of motion, with supporting papers, moved for an order compelling the defendants to produce documents pursuant to a notice to produce.

Supporting affidavits were submitted by the defendants as follows, Robert D. Lentz sworn to February 23, 1976, David Miller sworn to March 25, 1976, Dan Johnson sworn to March 31, 1976 and Anthony R. Palermo sworn to April 7, 1976. Since matters outside the pleadings have been submitted defendants' motion to dismiss is deemed to be a motion for summary judgment.

The motion of Litton Industries, Inc., Litton Automated Business Systems, Inc., and McBee Systems, to

dismiss the second amended complaint and for a protective order, or in the alternative, to defer response to the notice pending determination of the motions addressed to service of pleadings and the sufficiency of the pleadings, is in all respects denied.

The defendants shall comply with plaintiff's notices to produce filed December 21, 1975 and May 24, 1976, by producing the documents at a mutually agreeable time and place on or before July 30, 1976. If the parties are unable to agree on a time and place, I will fix by order a time and place on ex parte application.

ALL OF THE ABOVE IS SO ORDERED.

Harold P. Burke

HAROLD P. BURKE
United States District Judge

June 29, 1976.

STIPULATION, dated 5-21-76, and Order Correcting Caption in Summons Served on Dan Johnson.

UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF NEW YORK

GERALDINE SEVOR, Plaintiff, -vs- LITTON INDUSTRIES, INC., LITTON BUSINESS SYSTEMS, INC. and MCBEE SYSTEMS, a subsidiary of LITTON INDUSTRIES, INC. Defendants.	STIPULATION

WHEREAS, the plaintiff in the above noted matter caused to be served on Dan Johnson by Deputy U.S. Marshall on April 26, 1976 summons, complaint, amended complaint and notice to produce in this action, and

WHEREAS, the caption in the summons served on Dan Johnson contained a typographical error incorrectly designating the defendants,and

WHEREAS, the parties have entered into a stipulation correcting the caption on said summons,

NOW,THEREFORE, it is hereby stipulated and agreed by and between the undersigned, attorneys for plaintiff and defendants, that the caption in the summons served on Dan Johnson by the United States Marshall on April 26, 1976 is corrected to read:

STIPULATION, dated 5-21-76, and Order Correcting Caption Summons Served on Dan Johnson.

Geraldine Sevor,

Plaintiff,

-vs-

Litton Industries, Inc., Litton Business Systems, Inc. and McBee Systems, a Subsidiary of Litton Industries, Inc.

Defendants.

Emmelyn Logan-Baldwin
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510 Powers Building
Rochester, New York 14614
Telephone: 716-232-2292

Brennan, Centner, Palermo & Blauvelt

By _____
Anthony R. Palermo
Attorneys for Defendants
500 Reynolds Arcade Building
Rochester, New York 14614
Telephone: 716-454-6474

May 21, 1976

So ordered this day of May, 1976.

_____
U.S.D.J.

DEFENDANTS' NOTICE OF APPEAL.

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF NEW YORK

GERALDINE SEVOR,

Plaintiff,

-vs-

LITTON INDUSTRIES, INC., LITTON AUTOMATED BUSINESS SYSTEMS, INC. and McBEE SYSTEMS, A Subsidiary of Litton Industries,

Defendants.

NOTICE OF APPEAL

Civ. No. 75-559

NOTICE is hereby given that the defendants above named, Litton Industries, Inc., Litton Automated Business Systems, Inc., and McBee Systems, A Subsidiary of Litton Industries, hereby appeal to the United States Court of Appeals for the Second Circuit from the order and decision of the Hon. Harold P. Burke, dated June 29, 1976 and entered in this action on the 30th day of June, 1976, and from each and every part of said order and decision.

Dated: July 26, 1976

BRENNAN, CENTNER, PALERMO & BLAUVELT

By Anthony R. Palermo
Anthony R. Palermo, Esq.
A Member of the Firm

Attorneys for Defendants
Office and Post Office Address
500 Reynolds Arcade Building
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DEFENDANTS' NOTICE OF APPEAL.

TO: EMMELYN LOGAN-BALDWIN, Esq.
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